

EXHIBIT 1

MARZOOK/ IAP:

WIRE/CHECK DATE	SOURCE (PAYMENT FROM)	AUTHORIZATION	AMOUNT	DESTINATION (PAYMENT TO)	DIRECT VS INDIRECT	EXHIBIT NO.
02/11/1985	MOHAMMAD ABU MARZOOK COMMERCE BANK #571598	CHECK (1118):	\$ 7,500.00	IAP	DIRECT	NYGJ07 0000261 INFOCOM 37(1)
02/11/1985	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #71018360	CHECK (115):	\$ 5,000.00	IAP	DIRECT	ISE-SW 1B30/ 0000990-0991
05/31/1985	MOHAMMAD ABU MARZOOK COMMERCE BANK #571598	CHECK (151):	\$ 5,000.00	IAP	DIRECT	NYGJ07 0000389 NYGJ07 0000363 INFOCOM 37(2)
01/05/1986	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #71018360	CHECK (150):	\$ 2,591.00	IAP	DIRECT	ISE-SW 1B30/ 0001048-1049
10/03/1988	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #71018360	CHECK (210):	\$ 5,000.00	IAP	DIRECT	ISE-SW 1B30/ 0001139-1140
10/20/1988	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #71018360	CHECK (211):	\$ 1,500.00	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0001141-1142
11/06/1988	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #71018360	CHECK (216):	\$ 1,000.00	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0001151-1152
01/24/1989	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1004):	\$ 1,000.00	IAP	DIRECT	NYGJ06 0000689 NYGJ06 0000479 INFOCOM 36(2)

GOVERNMENT
EXHIBIT
020-0034
3:04-CR-240-G
U.S. v. HLF. et al.

MARZOOK/ IAP:

WIRE/ CHECK DATE	SOURCE (PAYMENT FROM)	AUTHORIZATION	AMOUNT	DESTIN Type	NT	DIRECT VS INDIRECT	EXHIBIT NO.
10/01/1989	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1026):	\$ 15,000.00 IAP				NYGJ06 0000712 NYGJ06 0000711 INFOCOM 36(3) / 11C(1)
10/19/1989	MOHAMMAD ABU MARZOOK	WIRE:	\$ 100,000.00 IAP				
10/20/1989	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1028):	\$ 2,500.00 YASSER BUSHNAQ				NYGJ06 0000718 ISE-SW 1B30/ 0000336-0337
11/16/1989	MOHAMMAD ABU MARZOOK	CHECK (1031):	\$ 30,000.00 IAP				
12/13/1989	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397083	CHECK (539):	\$ 50.00 IAP				INFOCOM 11C(3)
12/20/1989	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1015):	\$ 10,000.00 IAP				NYGJ06 0000732 NYGJ06 0000721-0722 ISE-SW 1B30/ 0000314-0315 INFOCOM 36(D)
01/10/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1016):	\$ 29,720.00 IAP				NYGJ06 0000730 NYGJ06 0000721-0722 ISE-SW 1B30/ 0000316-0317 INFOCOM 36(4) / 36(5) / 11C(4)
1/28/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1020):	\$ 1,200.00 YASSER BUSHNAQ				

MARZOOK/ IAP:

WIRE/CHECK DATE	SOURCE (PAYMENT FROM)	AUTHORIZATION	AMOUNT	DESTINATION (PAYMENT TO)	DIRECT VS INDIRECT	EXHIBIT NO.
01/28/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1020):	\$ 1,200.00	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0000324-0325
02/13/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1024):	\$ 50,000.00	IAP	DIRECT	ISE-SW 1B30/ 0000330-0331 INFOCOM 11C(5) / 11C(4)
02/15/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397083	C	\$ 200.00	YASSER BUSHNAQ	DIRECT	ISE-SW 1B18/ 0001074-1075 ISE-SW 1B18/ 0001415
02/25/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1036):	\$ 2,000.00	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0000344-0345
03/08/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHE K	\$ 30,000.00	IAP	DIRECT	ISE-SW 1B30/ 0000346-0347 INFOCOM 11C(6)
03/29/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK 10	\$ 2,000.00	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0000348-0349
04/12/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	EQ (\$ 10,000.00	IAP	DIRECT	NYGJ06 0000758 NYGJ06 0000755 ISE-SW 1B30/ 0000354-0355 INFOCOM 36(6) / 11C(7)
04/25/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1042):	\$ 2,000.00	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0000356-0357

MARZOOK/IAP:

WIRE/CHECK DATE	SOURCE (PAYMENT FROM)	AUTHORIZATION	AMOUNT	DESTINATION (PAYMENT TO)	DIRECT VS INDIRECT	EXHIBIT NO.
05/21/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1043):	\$ 15,000.00	IAP	INDIRECT	NYGJ06 0000763 NYGJ06 0000760 ISE-SW 1B30/ 0000358-0359 INFOCOM 36(7) / 11C(8)*
05/24/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397083	CHECK (583):	\$ 50,000.00	IAP	DIRECT	ISE-SW 1B18/ 000 INFOCOM 11C(9)
05/31/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1045):	\$ 2,166.66	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0000360-0361
06/15/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397083	CHECK (570):	\$ 25,000.00	IAP	DIRECT	ISE-SW 1B18/ 0001310-1311 INFOCOM 11C(10) / 11C(9)
06/15/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397212	CHECK (1089):	\$ 25,000.00	IAP	DIRECT	ISE-SW 1B18/ 0001156-1157 INFOCOM 11C(11) / 11C(10) /11C(9)
06/24/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1048):	\$ 2,166.66	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0000366-0367
07/16/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397212	CHECK (1090):	\$ 20,000.00	IAP	DIRECT	ISE-SW 1B18/ 000
07/16/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397083	CHECK (1132):	\$ 20,000.00	IAP	DIRECT	INFOCOM 11C(12) / 11C(13)

MARZOOK/ IAP:

WIRE/CHECK DATE	SOURCE (PAYMENT FROM)	AUTHORIZATION	AMOUNT	DESTINATION (PAYMENT TO)	DIRECT VS INDIRECT	EXHIBIT NO.
07/18/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397212	CHECK (1132):	\$ 15,000.00	IAP	DIRECT	ISE-SW 1B18/ 0001190-1191 INFOCOM 11C(12)
07/26/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1049):	\$ 2,166.66	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0000368-0369
07/30/1990	NADER SALAH to MOHAMMAD ABU MARZOOK endorsed by MARZOOK	CHECK (538):	\$ 10,000.00	IAP	DIRECT	INFOCOM 11C(15) / 11C(14)
08/01/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397083	CHECK (593):	\$ 10,000.00	IAP	DIRECT	ISE-SW 1B18/ 0001146-1147
08/01/1990	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397212	CHECK (1139):	\$ 10,000.00	IAP	DIRECT	ISE-SW 1B18/ 0001312-1313 INFOCOM 11C(14)
08/23/1990	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1051):	\$ 2,166.66	YASSER BUSHNAQ	DIRECT	ISE-SW 1B30/ 0000372-0373
10/15/1990	MOHAMMAD ABU MARZOOK	CHECK (1149):	\$ 20,000.00	IAP	DIRECT	INFOCOM 11C(16) / 11C(17)
10/24/1990	MOHAMMAD ABU MARZOOK CENTRAL FIDELITY BANK #7919965414	CHECK (226):	\$ 40,000.00	IAP	DIRECT	NYGJ08 0001725 NYGJ08 0001564 NYGJ08 0001573 INFOCOM 11B(1) / 11C(16)

MARZOOK/ IAP:

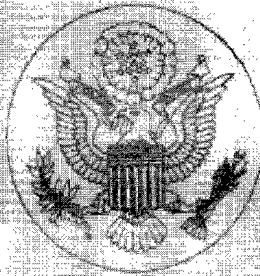
WIRE/CHECK DATE	SOURCE (PAYMENT FROM)	AUTHORIZATION	AMOUNT	DESTINATION (PAYMENT TO)	DIRECT VS INDIRECT	EXHIBIT NO.
01/25/1991	MOHAMMAD ABU MARZOOK	CHECK (226):	\$ 60,000.00	IAP	DIRECT	INFOCOM 11C(18)
	MOSTAN INTERNATIONAL CORP to MOHAMMAD ABU MARZOOK					
02/04/1991	endorsed by MARZOOK	CHECK (115):	\$ 90,000.00	IAP	DIRECT	INFOCOM 11C(19)
07/28/1991	MOHAMMAD ABU MARZOOK RUSTON STATE BANK #397083	CHECK (634):	\$ 55.00	IAP	DIRECT	NYGJ06 0000956 NYGJ06 0000944 INFOCOM 9C(1)
08/06/1991	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1065):	\$ 7,000.00	IAP	DIRECT	CGGJ12 0000197 CGGJ12 0000193 ISE-SW 1B64/ 0000382-0383 INFOCOM 11C(20) / 36(8)
08/22/1991	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1068):	\$ 6,000.00	IAP	DIRECT	CGGJ12 0000200 CGGJ12 0000198 INFOCOM 36(9) / 11C(21) / 11C(20)
02/28/1992	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1075):	\$ 7,753.00	IAP	DIRECT	CGGJ12 0000212 CGGJ12 0000210 ISE-SW 1B64/ 0000274-0275 INFOCOM 36(10)
03/30/1992	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1092):	\$ 17,000.00	IAP	DIRECT	CGGJ12 0000237 CGGJ12 0000235 ISE-SW 1B64/ 0000243-0244 ISE-SW 1B64/ 0000259 INFOCOM 36(L)
04/20/1992	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1108):	\$ 3,200.00	IAP	DIRECT	CGGJ12 0000245 CGGJ12 0000235 ISE-SW 1B64/ 0000247-0248 ISE-SW 1B64/ 0000259 INFOCOM 36(11) / 11C(12)
04/23/1992	MOHAMMAD ABU MARZOOK CENTRAL FIDELITY BANK #7920439173	CHECK (241):	\$ 50.00	IAP	DIRECT	NYGJ09 0002284 NYGJ07 0001608-1610 NYGJ01 0000830 INFOCOM 11A(15) / 11A(12)

MARZOOK/ IAP:

WIRE/CHECK DATE	SOURCE (PAYMENT FROM)	AUTHORIZATION	AMOUNT	DESTINATION (PAYMENT TO)	DIRECT VS INDIRECT	EXHIBIT NO.
06/24/1992	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1276):	\$ 15,000.00	IAP	DIRECT	CGGJ12 0000272 CGGJ12 0000262 ISE-SW 1B64/ 0000311-0312 INFOCOM 36(13)
08/01/1992	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1132):	\$ 15,000.00	IAP	DIRECT	CGGJ12 0000277 CGGJ12 0000274 ISE-SW 1B64/ 0000142-0143 ISE-SW 1B64/ 0000144 INFOCOM 36(14)
12/04/1992	MOHAMMAD ABU MARZOOK FIRST AMERICAN BANK OF VIRGINIA #68168179	CHECK (1258):	\$ 4,000.00	YASSER BUSHNAQ	DIRECT	ISE-SW 1B64/ 0000109-0110
			\$ 858,185.64			

EXHIBIT 2

United States



of America

Department of the Treasury
Internal Revenue Service

Date: March 3, 2006

CERTIFICATE OF OFFICIAL RECORD

I certify that the annexed is a true copy of the Form 990, Return of Organization Exempt From Income Tax, plus attachments, for Holy Land Foundation for Relief and Development Employer Identification Number 95-4227517, for tax year 1993, consisting of thirteen (13) pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury


Susan M. Bononcini
Resident Agent-in-Charge
Delegation Order CI-18

GOVERNMENT
EXHIBIT
011-0020
3:04-CR-240-G
U.S. v. HLF, et al.

Form 990

Department of the Treasury
Internal Revenue Service

Return of Organization Exempt From Income Tax

Under section 501(c) of the Internal Revenue Code (except black lung benefit trust or private foundation) or section 4947(a)(1) non-exempt charitable trust

Note: The organization may have to use a copy of this return to satisfy state reporting requirements.

1993

This Form is
Open to Public
Inspection

- Check if:
- ☐ Initial return
- ☐ Final return
- ☐ Amended return
- ☐ Change of address

Please use IRS label or print or type. See instructions.	C Name of organization Holy Land Foundation for Relief & Development		D Employer identification number 95-4227517
	Number and street (or P.O. box if mail is not delivered to street address) Room/suite P O Box 832390		E State registration number 1454143
	City, town, or post office, state, and ZIP code Richardson, Texas. 750133		F Check <input type="checkbox"/> If exemption application is pending

X

990.

(a) Is this a group return filed for affiliates? ☐ Yes ☒ NoI If either box in H is checked "Yes," enter four-digit group exemption number (GEN) ☐(b) If "Yes," enter the number of affiliates for which this return is filed: ☐J Accounting method: ☒ Cash ☐ Accrual(c) Is this a separate return filed by an organization covered by a group ruling? ☐ Yes ☒ No☐ Other (specify) ☐

Note: Form 990-EZ may be used by organizations with gross receipts less than \$100,000 and total assets less than \$250,000 at end of year.

Part I Statement of Revenue, Expenses, and Changes in Net Assets or Fund Balances

1 Contributions, gifts, grants, and similar amounts received:

1a	2,047,584
1b	
1c	

d Total (add lines 1a through 1c) (attach schedule—see instructions)

1d 2,047,584

3 Membership dues and assessments (see instructions)

4 Interest on savings and term

5 Dividends and interest from

6a Gross rents

b Less: rental expenses

c Net rental income (loss) (subtract line 6b from line 6a)

7 Other investment income (describe)

8a Gross amount from (A)

b Less: cost of other basis and sales expenses

c Gain or (loss) (attach schedule)

d Net gain or (loss) (combine line 8c, columns (A) and (B))

9 Special events and activities (attach schedule—see instructions):

a Gross revenue (not including \$ of

9a	
9b	

m line 9a)

10a Gross sales of inventory, less returns and allowances

b Less: cost of goods sold

c Gross profit or (loss) from sales of inventory

ract line 10b from line 10a)

11 Other revenue (from Part VII, line 103)

12 Total revenue (add lines 1d, 2, 3, 4, 5, 6c, 7, 8d, 9c, 10c, and 11)

13 Program services (from line 44, column (B)—see instructions)

14 Management and general (from line 44, column (C)—see instructions)

15 Fundraising (from line 44, column (D)—see instructions)

16 Payments to affiliates (attach schedule—see instructions)

17 Total expenses (add lines 16 and 44, column (A))

18 Excess or (deficit) for the year (subtract line 17 from line 12)

19 Net assets or fund balances at beginning of year (from line 74, column (A))

20 Other changes in net assets or fund balances (attach explanation) Rounding

21 Net assets or fund balances at end of year (combine lines 18, 19, and 20)

Revenue 703

Expenses

Net Assets

2,060,917

1,837,105

131,590

182,050

2,150,745

(89,828)

683,431

1

593,604

Form 990 (1993)

Page 2

Part II Statement of Functional Expenses

All organizations must complete column (A). Columns (B), (C), and (D) are required for section 501(c)(3) and (4) organizations and section 4947(a)(1) nonexempt charitable trusts but optional for others. (See instructions.)

Do not include amounts reported on line 6b, 8b, 9b, 10b, or 16 of Part I.		(A) Total	(B) Program services	(C) Management and general	(D) Fundraising
Grants and allocations (attach schedule) (cash \$ _____ noncash \$ _____)	22	1,651,690	1,651,690		
Specific assistance to individuals (attach schedule)	23				
Benefits paid to or for members (attach schedule)	24				
Compensation of officers, directors, etc.	25	18,600	4,650	9,300	4,650
Other salaries and wages	26	69,677	27,870	40,413	1,394
Pension plan contributions	27				
Other employee benefits	28	3,195	1,278	1,853	64
Payroll taxes	29	9,977	3,990	5,787	200
Professional fundraising fees	30				
Accounting fees	31	6,504	2,168	2,168	2,168
Legal fees	32	498	249		249
Supplies	33	15,255	7,317	3,659	4,268
Telephone	34	10,778	2,629	2,250	5,899
Postage and shipping	35	83,946	13,523	16,016	54,407
Occupancy	36	41,291	13,599	14,448	13,244
Equipment rental and maintenance	37	2,209	552		1,657
Printing and publications	38	108,743	62,637	8,105	38,001
Travel	39	71,957	28,325	15,490	28,142
Conferences, conventions, and meetings	40	4,421		1,336	3,085
Interest	41				
Depreciation, depletion, etc. (attach schedule)	42	24,395	6,876	4,380	13,139
Other expenses (itemize): a	43a				
b See attached schedule	43b	27,620	9,752	6,385	11,483
c	43c				
d	43d				
e	43e				
Total functional expenses (add lines 22 through 43) Organizations completing columns (B)-(D), carry these totals to lines 13-15	44	2,150,745	1,837,105	131,590	182,050

Reporting of Joint Costs.—Did you report in column (B) (Program services) any joint costs from a combined educational campaign and fundraising solicitation? ☐ Yes ☒ No

If "Yes," enter (i) the aggregate amount of these joint costs \$ _____; (ii) the amount allocated to Program services \$ _____; (iii) the amount allocated to Management and general \$ _____; and (iv) the amount allocated to Fundraising \$ _____.

Part III Statement of Program Service Accomplishments (See instructions.)

Describe what was achieved in carrying out the organization's exempt purposes. Fully describe the services provided; the number of persons benefited; or other relevant information for each program title. Section 501(c)(3) and (4) organizations and section 4947(a)(1) nonexempt charitable trusts must also enter the amount of grants and allocations to others.

Expenses
(Required for 501(c)(3) and (4) organizations and 4947(a)(1) trusts; optional for others.)

a	See attached statement	(Grants and allocations \$ 1,651,690)	1,837,105
b		(Grants and allocations \$)	
c		(Grants and allocations \$)	
d		(Grants and allocations \$)	
e		(Grants and allocations \$)	
f	Total (add lines a through e) (should equal line 44, column (B), Program services)		

Part IV

Note: Where required, attached schedules and amounts within the description column should be for end-of-year amounts only.

	(A) Beginning of year		(B) End of year
Assets			
	534,827	45	347,378
		46	
47a			
47b	8,050	47c	9,150
48a			
48b		48c	
		49	
50 Receivables due from officers, directors, trustees, and key employees		50	—
51a			
51b		51c	
		52	
		53	
54 Investments—securities (attach schedule)	91,284	54	94,502
55a 115,501			
55b 55,927	54,477	55c	59,574
		56	70,000
57a			
57b		57c	
b Less: accumulated depreciation (attach schedule)			
58 Other assets (describe ►)	2,479	58	13,000
59 Total assets (add lines 45 through 58) (must equal line 75)	691,117	59	593,604
Liabilities			
60 Accounts payable and accrued expenses	7,686	60	
61		61	
62 Support and revenue designated for future periods (attach schedule)		62	
63 Loans from officers, directors, trustees, and key employees (attach schedule)		63	
64a Tax-exempt bond		64a	
b Mortgages and other notes		64b	
65 Other liabilities (describe ►)		65	
66 Total liabilities (add lines 60 through 65)	7,686	66	
Fund Balances or Net Assets			
and accounting, check here ► <input type="checkbox"/> and complete			
lines 67 through 70 and lines 74 and 75 (see instructions).			
67a Current unrestricted fund	597,422	67a	478,103
		67b	
	86,008	68	115,501
		69	
		70	
71 Capital stock or trust principal		71	
72 Paid-in or capital surplus		72	
73 Retained earnings or accumulated income		73	
74 Total fund balances or net assets (add lines 67a through 70 OR lines 71 through 73; column (A) must equal line 19 and column (B) must equal line 21)	683,431	74	593,604
75 Total liabilities and fund balances/net assets (add lines 66 and 74)	691,117	75	593,604

Form 990 is available
 organization. How the public perceives an organization
 Therefore, please make sure the return is complete and

Form 990 (1993)

Page 4

Part V List of Officers, Directors, Trustees, and Key Employees (List each one even if not compensated (see instructions).)

(A) Name and address	(B) Title and average hours per week devoted to position	(C) Compensation (If not paid, enter -0-)	(D) Contributions to employee benefit plans & deferred compensation	(E) Expense account and other allowances
Ghassan Elashi 305 Townhouse, Richardson, Tx	Treasurer 10 Hours	-0-	-0-	-0-
Mohammed Elmezain 151 Derrom Ave, Patterson, NJ	Chairman 15 Hours	-0-	-0-	-0-
Shukri A Baker 324 Candlewood, Richardson, Tx	Exec. Director 50 Hours	18,600	-0-	-0-

Did any officer, director, trustee, or key employee receive aggregate Compensation of more than \$100,000 from your organization and all related organizations, of which more than \$10,000 was provided by the related organizations? ☐ Yes ☒ No
If "Yes," attach schedule—see instructions.

Part VI Other Information

	Y	s	No
76 Did the organization engage in any activity not previously reported to the IRS? If "Yes," attach a detailed description of each activity.	76		X
77 Were any changes made in the organizing or governing documents, but not reported to the IRS? If "Yes," attach a conformed copy of the changes.	77		X
78a Did the organization have unrelated business gross income of \$1,000 or more during the year covered by this return?	78a		X
b If "Yes," has it filed a tax return on Form 990-T, Exempt Organization Business Income Tax Return, for this year?	78b		
79 Was there a liquidation, dissolution, termination, or substantial contraction during the year? If "Yes," attach a statement; see instructions.	79		X
80a Is the organization related (other than by association with a statewide or nationwide organization) through common membership, governing bodies, trustees, officers, etc., to any other exempt or nonexempt organization? (See instructions.)	80a		X
b If "Yes," enter the name of the organization and check whether it is <input type="checkbox"/> exempt OR <input type="checkbox"/> nonexempt.			
81a Enter the amount of political expenditures, direct or indirect, as described in the instructions. 81a none	81a		
b Did the organization file Form 1120-POL, U.S. Income Tax Return for Certain Political Organizations, for this year?	81b		X
82a Did the organization receive donated services or the use of materials, equipment, or facilities at no charge or at substantially less than fair rental value?	82a		X
b If "Yes," you may indicate the value of these items here. Do not include this amount as revenue in Part I or as an expense in Part II. (See instructions for reporting in Part III.) 82b			
Did the organization comply with the public inspection requirements for returns and exemption applications?	83	X	
84a Did the organization solicit any contributions or gifts that were not tax deductible?	84a		X
b If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible? (See General Instruction M.)	84b		
85 Section 501(c)(4), (5), or (6) organizations.— a Were substantially all dues nondeductible by members?	85a		
b Did the organization make only in-house lobbying expenditures of \$2,000 or less? If "Yes" to either 85a or 85b , do not complete 85c through 85h below.	85b		
c Dues, assessments, and similar amounts from members for January 1994 and later.	85c		
d Section 162(e) lobbying and political expenditures after December 1993.	85d		
e Aggregate nondeductible amount of section 6033(e)(1)(A) dues notices.	85e		
f Taxable amount of lobbying and political expenditures (re 85d less 85e ; (see instructions).)	85f		
g Does the organization elect to pay the section 6033(e) tax on the amount in 85f ?	85g		
h Does the organization elect to add the amount in 85f to its reasonable estimate of dues allocable to nondeductible lobbying and political expenditures for the following tax year?	85h		
86 Section 501(c)(7) organizations.—Enter:			
a Initiation fees and capital contributions included on line 12.	86a		
b Gross receipts, included on line 12, for public use of club facilities (See instructions.)	86b		
87a Section 501(c)(12) organizations.—Enter: Gross income from members or shareholders	87a		
b Gross income from other sources. (Do not net amounts due or paid to other sources against amounts due or received from them.)	87b		
88 At any time during the year, did the organization own a 50% or greater interest in a taxable corporation or partnership? If "Yes," complete Part IX.	88		X
89 Public interest law firms.—Attach information described in the instructions.			
90 List the states with which a copy of this return is filed. California The books are in care of Mohammed H. Azad, CPA Telephone no. (214) 692-0202 Located at 11300 N Central Expwy, Ste. 405, Dallas, Tx ZIP code 75243			
92 Section 4947(a)(1) nonexempt charitable trusts filing Form 990 in lieu of form 1041, U.S. Fiduciary Income Tax Return, should check here and enter the amount of tax-exempt interest received or accrued during the tax year.	92		

Enter gross amounts unless otherwise indicated.

93 Program service revenue:

d

e

f

g Fees and contracts from government agencies

94 Membership dues and assessments

95 Interest on savings and temporary cash investments

96 id and interest from

97 Net rental income or (loss) from real estate:

a debt-financed property

b not debt-financed property

98 Net rental income or (loss) from personal property

99 Other investment income

100 Gain or (loss) from sales of assets other than inventory

101 Net income or (loss) from special events

102 Gross profit or (loss) from sales of inventory

103 Other revenue: a

b

c

d

e

104 Subtotal (add columns (B), (D), and (E))

105 TOTAL (add line 104, columns (B), (D), and (E)).

Note: (Line 705 plus line 7d, Part I, should equal the amount on line 12, Part I.)

Part VIII Relationship of Activities to the Accomplishment of Exempt Purposes N/A

No. Explain how each activity for which income is reported in column (E) of Part VII contributed importantly to the accomplishment of the organization's exempt purposes (other than by providing funds for such purposes). (See instructions.)

Part IX

Name, address, and employer identification number of corporation or partnership	Percentage of ownership interest	Nature of business activities	Total income	End-of-year assets
	%			

Please Sign Here

Under penalties of perjury, I declare that I have examined this return, knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on information furnished by taxpayer.

Signature of officer

Date

Title

Preparer's signature

Date

Check if self-employed ☒

Preparer's social security no.

Firm's name (or your name if self-employed)

11300

E.I. No.

360 : 52 7356

6

SCHEDULE A
(Form 990)**Organization Ex mpt Under Section 501(c)(3)****(Except Private Foundation), and Section 501(a), 501(f), 501(k),
or Section 4947(a)(1) Nonexempt Charitable Trust**

OMB No. 1545-0047

1993Department of the Treasury
Internal Revenue Service▶ **Must be completed by the above organizations and attached to their Form 990 (or 990-EZ).****Supplementary Information**

Name of the organization

Holy Land Foundation for Relief & Development

Employer identification number

95 : 4227517

Part I

(a) Name and address of each employee paid more than \$30,000	(b) Title and average hours per week devoted to position	(c) Compensation	(d) Contributions to employee benefit plans & deferred compensation	(e) Expense account and other allowances
NONE				
Total number of other employees paid over \$30,000				

Part II Compensation of the Five Highest Paid Persons for Professional Services

(a) Name and address of each person paid more than \$30,000	(b) Type of service	(c) Compensation
NONE		
Total number of other persons paid over \$30,000 for professional services		

Part III Statements About Activities

	Yes	No
1 During the year, has the organization attempted to influence national, state, or local legislation, including any attempt to influence public opinion on a legislative matter or referendum?		X
If "Yes," enter the total expenses paid or incurred in connection with the lobbying activities. \$		
Organizations that made an election under section 501(h) by filing Form 5768 must complete Part VI-A. Other organizations checking "Yes," must complete Part VI-B AND attach a statement giving a detailed description of the lobbying activities.		
2 During the year, has the organization, either directly or indirectly, engaged in any of the following acts with any of its trustees, directors, officers, creators, key employees, or members of their families, or with any taxable organization with which any such person is affiliated as an officer, director, trustee, majority owner or principal beneficiary:		
a Sale, exchange, or leasing of property?		X
b Lending of money or other extension of credit?		X
c Furnishing of goods, services, or facilities?		X
d Payment of Compensation (or Payment or reimbursement of expenses if more than \$1,000)?		X
e Transfer of any part of its income or assets?		X
If the answer to any question is "Yes," attach a detailed statement explaining the transactions.		
3 Does the organization make grants for scholarships, fellowships, student loans, etc.?	X	
4 Attach a statement explaining how the organization determines that individuals or organizations receiving grants or loans from it in furtherance of its charitable programs qualify to receive payments. (See instructions.)		

Part IV Reason for Non-Private Foundation Status (See instructions for definitions.)The organization is not a private foundation **because** it is (please check only ONE applicable box):

- 5 ☐ A church, convention of churches, or association of churches. Section 170(b)(1)(A)(i).
- 6 ☐ A school. Section 170(b)(1)(A)(ii). (Also complete Part V, page 3.)
- 7 ☐ A hospital or a cooperative hospital service organization. Section 170(b)(1)(A)(iii).
- 8 ☐ A Federal, state, or local government or governmental unit. Section 170(b)(1)(A)(v).
- 9 ☐ A medical research organization operated in conjunction with a hospital. Section 170(b)(1)(A)(iii). Enter the hospital's name, city, and state ▶
- 10 ☐ An organization operated for the benefit of a college or university owned or operated by a governmental unit. Section 170(b)(1)(A)(iv). (Also complete the Support Schedule below.)
- 11a ☒ An organization that normally receives a substantial part of its support from a governmental unit or from the general public. Section 170(b)(1)(A)(vi). (Also complete the Support Schedule below.)
- 11b ☐ A community trust. Section 170(b)(1)(A)(vi). (Also complete the Support Schedule below.)
- 12 ☐ An organization that normally receives: (a) no more than 1/3 of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975, and (b) more than 1/3 of its support from contributions, membership fees, and gross receipts from activities related to its charitable, etc., functions—subject to certain exceptions. See Section 509(a)(2). (Also complete the Support Schedule below.)
- 13 ☐ An organization that is not controlled by any disqualified persons (other than foundation managers) and supports organizations described in: (1) lines 5 through 12 above; or (2) section 501(c)(4), (5), or (6), if they meet the test of section 509(a)(2). (See section 509(a)(3).)

Provide the following information about the supported organizations. (See instructions for Part IV, line 13.)

(a) Name(s) of supported organization(s)	(b) Line number from above

Note: You may use the worksheet in the instructions for converting from the accrual to the cash method of accounting.

Calendar year (or fiscal year beginning in) ▶	(a) 1992	(b) 1991	(c) 1990	(d) 1989	(e) Total
15 Gifts, grants, and contributions received. (Do not include unusual grants. See line 28.)	1,644,023	1,042,706	884,090	210,275	3,781,094
16 Membership fees received					
17 Gross receipts from admissions, merchandise sold or services performed, or furnishing of facilities in any activity that is not a business unrelated to the organization's charitable, etc., purpose					
18 Gross income from interest, dividends, amounts received from payments on securities loans (section 512(a)(5)), rents, royalties, and unrelated business taxable income (less section 511 taxes) from businesses acquired by the organization after June 30, 1975.	1,093	1,972	160		3,225
19 Net income from unrelated business activities not included in line 18					
20 Tax revenues levied for the organization's benefit and either paid to it or expended on its behalf					
21 The value of services or facilities furnished to the organization by a governmental unit without charge. Do not include the value of services or facilities generally furnished to the public without charge.					
22 Other income. Attach a schedule. Do not include gain or (loss) from sale of capital assets					
23 Total of lines 15 through 22.	1,645,116	1,044,678	884,250	210,275	3,784,319
24 Line 23 minus line 17.	1,645,116	1,044,678	884,250	210,275	3,784,319
25 Enter 1% of line 23	16,451	10,447	8,842	2,103	
26 Organizations described in lines 10 or 11:					
a Enter 2% of amount in column (e), line 24					75,686
b Attach a list (which is not open to public inspection) showing the name of and amount contributed by each person (other than a governmental unit or publicly supported organization) whose total gifts for 1989 through 1992 exceeded the amount shown in line 25a. Enter the sum of all these excess amounts here ▶					185,942

8

Support Schedule (continued) (Complete only if you checked a box on lines 10, 11, or 12.)

27 Organizations described on line 12:

- a Attach a list, for amounts shown on lines 15, 16, and 17, to show the name of, and total amounts received in each year from, each "disqualified person." Enter the sum of such amounts for each year:

(1992) (1991) (1990) (1988)

- b Attach a list to show, for 1989 through 1992, the name of, and amount included in line 17 for, each person (other than a "disqualified person") from whom the organization received, during that year, an amount that was more than the larger of (1) the amount on line 25 for the year or (2) \$5,000. Include organizations described in lines 5 through 11, as well as individuals. After computing the difference between the amount received and the larger amount described in (1) or (2), enter the sum of all these differences (the excess amounts) for each year

(1992) (1991) (1990) (1989)

- 28 For an organization described in line 10, 11, or 12, that received any unusual grants during 1989 through 1992, attach a list (which is not open to public inspection) for each year showing the name of the contributor, the data and amount of the grant, and a brief description of the nature of the grant. Do not include these grants in line 15. (See instructions.)

Part V Private School Questionnaire

(To be completed ONLY by schools that checked the box on line 6 in Part IV) N/A

	Yes	No
29 Does the organization have a racially nondiscriminatory policy toward students by statement in its charter, bylaws, other governing instrument, or in a resolution of its governing body?	29	
30 Does the organization include a statement of its racially nondiscriminatory policy toward students in all its brochures, catalogues, and other written communications with the public dealing with student admissions, programs, and scholarships?	30	
31 Has the organization publicized its racially nondiscriminatory policy through newspaper or broadcast media during the period of solicitation for students, or during the registration period if it has no solicitation program, in a way that makes the policy known to all parts of the general community it serves? If "Yes," please describe; if "No," please explain. (If you need more space, attach a separate statement.)	31	
2 Does the organization maintain the following:		
a Records indicating the racial composition of the student body, faculty, and administrative staff?	32a	
b Records documenting that scholarships and other financial assistance are awarded on a racially nondiscriminatory basis?	32b	
c Copies of all catalogues, brochures, announcements, and other written communications to the public dealing with student admissions, programs, and scholarships?	32c	
d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. (If you need more space, attach a separate statement.)	32d	
33 Does the organization discriminate by race in any way with respect to:		
a Students' rights or privileges?	33a	
b Admissions policies?	33b	
c Employment of faculty or administrative staff?	33c	
d Scholarships or other financial assistance? (See instructions.)	33d	
e Educational policies?	33e	
f Use of facilities?	33f	
g Athletic programs?	33g	
h Other extracurricular activities? If you answered "Yes" to any of the above, please explain. (If you need more space, attach a separate statement.)	33h	
34a Does the organization receive any financial aid or assistance from a governmental agency?	34a	
b Has the organization's right to such aid ever been revoked or suspended? If you answered "Yes" to either 34a or b, please explain using an attached statement.	34b	
35 Does the organization certify that it has complied with the applicable requirements of sections 4.01 through 4.05 of Rev. Proc. 75-50, 19752 C.B. 587, covering racial nondiscrimination? If "No," attach an explanation. (See instructions for Part V.)	35	

Schedule A (Form 990) 1993

Page 4

Part VI-A Lobbying Expenditures by Electing Public Charities (See instructions.)
(To be completed ONLY by an eligible organization that filed Form 5768)

N/A

Check here ☐ a If the organization belongs to an affiliated group (see instructions).Check here ☐ b If you checked a and "limited control" provisions apply (see instructions).**Limits on Lobbying Expenditures**

(The term "expenditures" means amounts paid or incurred)

	(a) Affiliated group totals	(b) To be completed for ALL electing organizations
36 Total lobbying expenditures to influence public opinion (grassroots lobbying)	36	
37 Total lobbying expenditures to influence a legislative body (direct lobbying)	37	
38 Total lobbying expenditures (add lines 36 and 37)	38	
39 Other exempt purpose expenditures (see Part VI-A instructions)	39	
40 Total exempt purpose expenditures (add lines 38 and 39) (see instructions).	40	
41 Lobbying nontaxable amount. Enter the amount from the following table— If the amount on line 40 is— The lobbying nontaxable amount is— Not over \$500,000 20% of the amount on line 40 Over \$500,000 but not over \$1,000,000 \$100,000 plus 15% of the excess over \$500,000 Over \$1,000,000 but not over \$1,500,000 \$175,000 plus 10% of the excess over \$1,000,000 Over \$1,500,000 but not over \$17,000,000 \$225,000 plus 5% of the excess over \$1,500,000 Over \$17,000,000 \$1,000,000	41	
42 Grassroots nontaxable amount (enter 25% of line 41).	42	
43 Subtract line 42 from line 36. Enter -0- if line 42 is more than line 36.	43	
44 Subtract line 41 from line 38. Enter -0- if line 41 is more than line 38.	44	

Caution: **File Form 4720 if there is an amount on either line 43 or line 44.**

Calendar year (or fiscal year beginning in) ▶	Lobbying Expenditures During 4-Year Averaging Period				
	(a) 1993	(b) 1992	(c) 1991	(d) 1990	(e) Total
45 Lobbying nontaxable amount (see instructions)					
49 Grassroots ceiling amount (50% of line 45(e))					
50 Lobbying expenditures (see instructions)					

Part VI-B Lobbying Activity by Nongovernmental Public Charities
(For reporting by organizations that did not complete Part VI-A)

N/A

During the year, did the organization attempt to influence national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:

	Yes	No	Amount
a Volunteers			
b Paid staff or management (include compensation in expenses reported on lines c through h)			
c Media advertisements			
d Mailings to members, legislators, or the public			
e Publications, or published or broadcast statements			
f Grants to other organizations for lobbying purposes			
g Direct contact with legislators, their staffs, government officials, or a legislative body			
h Rallies, demonstrations, seminars, conventions, speeches, lectures, or any other means			
i Total lobbying expenditures (add lines c through h)			

If "Yes" to any of the above, also attach a statement giving a detailed description of the lobbying activities.

	Yes	No
51a(i)		
a(ii)		
b(i)		
b(ii)		
b(iii)		
b(iv)		
b(v)		
b(vi)		
c		

[illegible][illegible]

THE HOLY LAND FOUNDATION FOR
RELIEF AND DEVELOPMENT

T.Y.E. 12/31/93

T.I.N. 95-4227517

FORM 990

PART II, LINE 43, STATEMENT OF FUNCTIONAL EXPENSES

	TOTAL	PROGRAM SERVICES	MANAGEMENT & GENERAL	FUND- RAISING
ADVERTISING	10,646	5,323		5,323
BANK CHARGES	1,398		1,398	
CONTRACT LABOR	1,465			1,465
DUES & SUBS.	2,666	400	1,600	666
HAILING LIST	5,000	2,500		2,500
UTILITIES	6,117	1,529	3,059	1,529
PENALTIES	234		234	
LIMITED P/S TAX STATE OF CALIF	94		94	
TOTALS	27,620	9,752	6,385	11,483

PART III, STATEMENT OF PROGRAM SERVICE ACCOMPLISHMENTS

PROGRAM BRANTS ARE APPROPRIATED TO VARIOUS PROJECTS,
INCLUDING ASSISTANCE TO NON-PROFIT MEDICAL/DENTAL CLINICS,
ORPHANAGES, EDUCATIONAL FACILITLES AND SOCIAL WELFARE
CENTERS AND RELIGIOUS FACILITIES IN THE AREAS OF THE HOLY
LANDS AFFECTED BY WAR AND CIVIL UNREST.

PART IV, LINE 54: INVESTMENTS

INVESTMENT XN MSI LIMITED PARTNERSHIP I

BEGINNING	\$ 91,284
ADD: PARTNERS SHARE OF EARNINGS	7,590
LESS: WITHDRAWALS & DISTRIBUTIONS	(4,278)
LESS: PARTNERS SHARE OF CALIF. INCOME TAX	(94)
BALANCE AS OF 12/31/93	\$ 94,502

**THE HOLY LAND FOUNDATION FOR
RELIEF AND DEVELOPMENT**

T.Y.E. 12/31/93

T.I.N. 95-4227517

FORM 990

PART II. LINE 42 & PART IV. LINE 55a: DEPRECIATION

	COST	METHOD	CUMULATIVE	CURRENT
EQUIPMENT	71,184	MARCS/5	40,335	15,401
MAILING SORTING MACHINE	17,551	MARCS/7	6,805	4,298
FURNISHINGS	9,076	MARCS/7	5,238	1,535
TELEPHONE SYSTEM	2,715	MARCS/7	1,053	665
VIDEO PRODUCTION	14,975	MARCS/3	2,496	2,496
TOTALS	115,501		55,927	24,395

PART IV. LINE 56: INVESTMENTS-OTHER

INVESTMENT IN A-1 JEWELERS

BEGINNING	\$ 70,000
ADD: EARNINGS/DIVIDENDS	5,743
LESS: DISTRIBUTIONS	(5,743)
BALANCE AS OF 12/31/93	\$ 70,000

PART IV. LINE 58: OTHER ASSETS

GOLD	\$ 9,219
DEPOSITS	2,479
PREPAID PAYROLL TAXES	390
DISTRIBUTION RECEIVABLE FROM M S I	912
TOTAL	\$ 13,000

**THE HOLY LAND FOUNDATION FOR
RELIEF AND DEVELOPMENT**

T.Y.E. 12/31/93

T.I.N. 95-4227517

SCHEDULE A**PART III. LINE 4: STATEMENT ABWT ACTIVITIES**

SCHOLARSHXPS OR EDUCATIONAL ASSISTANCE DISBURSEMENTS ARE MADE TO THE NEEDY STUDENTS AT VARIOUS LEVELS OF THE EDUCATIONAL SYSTEH IN THE HOLY LANDS BASED UPON THE RECOMMENDATIONS FROM COMMUNITY LEADERS AND CHARITABLE ORGANIZATIONS IN THE AREAS. THE CRITERIA USED FOR SELECTION INCLUDES NEEDS, AREA OF STUDY, PAST PERFORMANCE AND DESIRE.

PART IV. LINE 26b:

NAME	TOTAL GIFTS 1989 - 1992	EXCESS AMOUNT
KHAMIS AKEL	103,000	27,314
MOUSA AEOU MARZOOK	210,000	134,314
ALEXANDRIA CARPET	100,000	24,314
TOTALS	310,000	185,942

PART IV. LINE 28:

	NAME	AMOUNT	NATURE OF GRANT
1989	NONE		
1990	KHAMIS AKEL	103,000	ONE TIME CASH
1991	BADADAH CONNECTION	50,000	ONE TIME CASH
1992	MOUSA ABOU MARZOOK	210,000	ONE TIME CASH
	ALEXANDERIA CARPET	100,000	ONE TIME CASH
	FAYEZ SHUKAIRY	58,400	ONE TIME CASH
	NASSER ALKHATIB	22,450	ONE TIME CASH
	AHMED A BAZARA	20,000	WE TIME CASH
	ALAA SAMAN	15,500	ONE TIME CASH

EXHIBIT 3

WIRE TRANSFER ADVISE

WIRE TRANSFER ADVISE

PAGE: 1

NAT'IONAL BANK, N.A.
WIRE TRANSFER DEPT MDG-101-14-30
BALTIMORE, MD 21203-0987

ACCOUNT: 2383033413
DATE: 10/31/99

DIRECT INQUIRIES TO:
(800) 965-HIRE

CLERK
1511 K ST NW STE 807
WASHINGTON
20005-1401

THE FOLLOWING INFO HAS CREDITED TO:

SEQUENCE NUMBER: 941031011157000
FED REFERENCE NUMBER: 9410310010920024

SENDER:

ORIGINATOR:
ORIGINATING BANK:
BENEFICIARY:

NAT'IONAL BANK, N.A.
POLYLAND FOUNDATION
NAT'IONAL BANK, N.A.
CIR

DETAILS OF PAYMENT:

SEP-941031001092

AMOUNT:

15,000.00

10/31/99

EXHIBIT 4

Form **990**
Department of the Treasury
Internal Revenue Service

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

OMB No 1545-0047

2005

Open to Public
Inspection

The organization may have to use a copy of this return to satisfy state reporting requirements.

B Check if applicable:
☐ Address change
☐ Name change
☐ Initial return
☐ Final return
☐ Amended return
☐ Application pending

C Name of organization
COUNCIL ON AMERICAN-ISLAMIC RELATIONS, INC
 Number and street (or P.O. box if mail is not delivered to street address) Room/suite
453 NEW JERSEY AVENUE SE
 City or town, state or country, and ZIP + 4
WASHINGTON, DC 20003

D Employer identification number
52-1887951

E Telephone number
202-488-8787

☐ Other (specify) _____

G Website: **WWW.CAIR.COM**

J Organization type (check only one) ☒ 501(c)(4) (insert no) ☐ 4947(a)(1) or ☐ 527

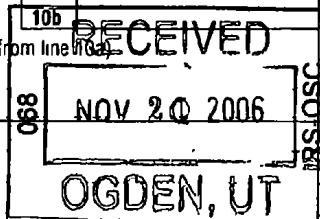
K Check here ☐ if the organization's gross receipts are normally not more than \$25,000. The organization need not file a return with the IRS; but if the organization chooses to file a return, be sure to file a complete return. Some states require a complete return.

L Gross receipts: Add lines 6b, 8b, 9b, and 10b to line 12 **2,465,536.**

H and I are not applicable to section 527 organizations.
H(a) Is this a group return for affiliates? ☐ Yes ☒ No
H(b) If Yes, enter number of affiliates, **N/A**
H(c) Are all affiliates included? **N/A** ☐ Yes ☐ No (If 'No,' attach a list.)
H(d) Is this a separate return filed by an organization covered by a group ruling? ☐ Yes ☒ No
I Group Exemption Number **N/A**
M Check ☐ if the organization is not required to attach Sch. B (Form 990, 990-EZ, or 990-PF).

Part I Revenue, Expenses, and Changes in Net Assets or Fund Balances

Revenue	1	Contributions, gifts, grants, and similar amounts received:			
	a	Direct public support	1a	1,667,057.	
	b	Indirect public support	1b		
	c	Government contributions (grants)	1c		
	d	Total (add lines 1a through 1c) (cash \$ 1,667,057. noncash \$)	1d	1,667,057.	
	2	Program service revenue including government fees and contracts (from Part VII, line 93)	2	528,427.	
	3	Membership dues and assessments	3	65,377.	
	4	Interest on savings and temporary cash investments	4		
	5	Dividends and interest from securities	5		
	6a	Gross rents	6a	157,190.	
Expenses	b	Less: rental expenses	6b	107,031.	
	c	Net rental income or (loss) (subtract line 6b from line 6a)	6c	50,159.	
	7	Other investment income (describe)	7		
	8a	Gross amount from sales of assets other than inventory	8a		
	b	Less: cost or other basis and sales expenses	8b		
	c	Gain or (loss) (attach schedule)	8c		
	d	Net gain or (loss) (combine line 8c, columns (A) and (B))	8d		
	9	Special events and activities (attach schedule). If any amount is from gaming, check here <input type="checkbox"/>			
	a	Gross revenue (not including \$ 84,936. of contributions reported on line 1a)	9a	47,485.	
	b	Less: direct expenses other than fundraising expenses	9b	106,979.	
Net Assets	c	Net income or (loss) from special events (subtract line 9b from line 9a)	9c	-59,494.	
	10a	Gross sales of inventory, less returns and allowances	10a		
	b	Less: cost of goods sold	10b		
	c	Gross profit or (loss) from sales of inventory (attach schedule) (subtract line 10b from line 10a)	10c		
	11	Other revenue (from Part VII, line 103)	11		
	12	Total revenue (add lines 1d, 2, 3, 4, 5, 6c, 7, 8d, 9c, 10c, and 11)	12	2,251,526.	
	13	Program services (from line 44, column (B))	13	1,384,057.	
	14	Management and general (from line 44, column (C))	14	380,950.	
	15	Fundraising (from line 44, column (D))	15	535,555.	
	16	Payments to affiliates (attach schedule)	16		
17	Total expenses (add lines 16 and 44, column (A))	17	2,300,562.		
18	Excess or (deficit) for the year (subtract line 17 from line 12)	18	-49,036.		
19	Net assets or fund balances at beginning of year (from line 73, column (A))	19	4,965,917.		
20	Other changes in net assets or fund balances (attach explanation)	20	0.		
21	Net assets or fund balances at end of year (combine lines 18, 19, and 20)	21	4,916,881.		



Council on American-Islamic Relations, INC.**EIN:52-1887951**ATTACHMENT TO FORM 990 SCHEDULE B FOR 2005
DONATIONS \$5000 AND OVER

<u>NAME</u>	<u>ADDRESS</u>	<u>AMOUNT</u>
Adnan Bogary	P.O. Box 1800, Jeddah, Saudi Arabia, 21441	\$ 600,000
		\$ 347,388
		\$ 150,000
		\$ 99,978
		\$ 69,980
		\$ 20,000
		\$ 10,000
		\$ 10,000
		\$ 7,500
		\$ 7,100
		\$ 7,100
		\$ 6,080
		\$ 6,000
		\$ 5,500
		\$ 5,220
		\$ 5,000
		\$ 5,010
		\$ 5,000
		\$ 5,000
TOTAL		\$1,366,466

EXHIBIT 5



SPECIAL DISPATCH

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Special Dispatch Series - No. 1092

February 14, 2006

No. 1092

The Covenant of the Islamic Resistance Movement – Hamas

In view of the recent victory of the Islamic Resistance Movement (Hamas) in the Palestinian Authority Legislative Council elections, it is important to make the Hamas covenant [1] available in English for English speaking readers. The English version which is currently posted in a number of websites is not satisfactory, and therefore MEMRI is providing here a closer, more accurate translation.

In the name of Allah the Merciful and the Compassionate
Palestine, Muharram 1, 1409 A.H./August 18, 1988

In the name of Allah the Merciful and the Compassionate

"You are the best nation that has been brought out for mankind. You command good and forbid evil and believe in Allah. If only the people of the Book [i.e., Jews and Christians] had believed, it would have been well for them. Some of them believe, but most of them are iniquitous. They will never be able to do you serious harm, they will only be an annoyance. If they fight you, they will turn their backs and flee, and will not be succored. Humiliation is their lot wherever they may be, except where they are saved from it by a bond with Allah or by a bond with men. They incurred upon themselves Allah's wrath, and wretchedness is their lot, because they denied Allah's signs and wrongfully killed the prophets, and because they disobeyed and transgressed." (Koran, 3:110-112).

"Israel will exist, and will continue to exist, until Islam abolishes it, as it abolished that which was before it." [From the words of] The martyr, Imam Hasan al-Banna', Allah's mercy be upon him. [2]

"The Islamic world is burning, and each and every one of us must pour water, even if it be a little, to extinguish whatever he can extinguish, without waiting for others." [From the words of] Sheikh Amjad Al-Zahawi, Allah's mercy be upon him. [3]

In the name of Allah the Merciful and the Compassionate

Preamble

Praise be to Allah. We seek help from Him, we ask forgiveness from Him, we ask Him for guidance, and we rely on Him. Prayer and peace be upon Allah's messenger and upon his family and companions, and those who are loyal to him and spread his message and follow his *sunna* [the Prophet's custom]. Prayer and peace be forever upon them as long as heaven and earth exist.

Search

Oh people, from the midst of great troubles and in the depths of suffering, and from the beating of believing hearts and arms purified for worship, out of cognizance of duty and in response to Allah's command - thence came the call [of our movement] and the meeting and joining [of forces], and thence came education in accordance with Allah's way and a resolute will to carry out [the movement's] role in life, overcoming all of the obstacles and surmounting the difficulties of the journey. Thence came also continuous preparation, [along with] readiness to sacrifice one's life and all that is valuable for the sake of Allah.

Then the seed took form and [the movement] began to move forward through this stormy sea of wishes and hopes, yearnings and aspirations, dangers and obstacles, pains and challenges, both locally [in Palestine] and abroad.

When the idea ripened, and the seed grew, and the plant shot its roots into the ground of reality, away from fleeting emotions and improper hastiness, then the Islamic Resistance Movement [Hamas] [4] set out to play its role, marching onward for the sake of Allah. [In doing this, Hamas] joins arms with all those who wage jihad for the liberation of Palestine. [5] The souls of its jihad fighters meet the souls of all those jihad fighters who sacrificed their lives for the land of Palestine, from the time when the Prophet's companions conquered it until the present.

The covenant of the Islamic Resistance Movement (Hamas) reveals its face, presents its identity, clarifies its stand, makes clear its aspiration, discusses its hopes, and calls out to help it and support it and to join its ranks, because our fight with the Jews is very extensive and very grave, and it requires all the sincere efforts. It is a step that must be followed by further steps; it is a brigade that must be reinforced by brigades upon brigades from this vast Islamic world, until the enemies are defeated and Allah's victory is revealed.

This is how we see them coming on the horizon: "And after a time you will come to know about it." (Koran, 38:88)

"Allah has written: It is I and My messengers who will surely prevail. Allah is Strong and Mighty." (Koran, 58:21)

"Say: This is my way. I call on Allah with certainty, I and those who follow me, and glory be to Allah, I am not among the polytheists." (Koran, 12:108)

Chapter One: Introduction to the Movement

Ideological Premises

Article One

The Islamic Resistance Movement: Islam is its way. It is from Islam that it derives its ideas, concepts, and perceptions concerning the universe, life, and man, and it refers to Islam's judgment in all its actions. It is from Islam that it seeks direction so as to guide its steps.

The Relation between the Islamic Resistance Movement and the Muslim Brotherhood

Article Two

The Islamic Resistance Movement is one of the wings of the Muslim Brotherhood in Palestine. The Muslim Brotherhood movement is a global organization and is the largest of the Islamic movements in modern times. It is distinguished by its profound understanding and its conceptual precision and by the fact that it encompasses the totality of Islamic concepts in all aspects of life, in thought and in creed, in politics and in economics, in education and in social affairs, in judicial matters and in matters of government, in preaching and in teaching, in art and in communications, in secret and in the open, and in all other areas of life.

Structure and Formation

Article Three

The Islamic Resistance Movement is founded upon Muslims who gave their allegiance to Allah and served Him as He ought to be served. "I did not create jinns and men except that they should serve me." (Koran, 51:56)

[These Muslims] recognized their duty towards themselves, their families and their homeland, fearing Allah in all of this. They raised the banner of jihad in the face of the oppressors, in order to deliver the land and the believers from their filth, impurity and evil. "We hurl the truth against falsehood and crush its head, and lo, it vanishes." (Koran, 21:18)

Article Four

The Islamic Resistance Movement welcomes every Muslim who embraces its creed, adopts its ideology, is committed to its way, keeps its secrets and desires to join its ranks in order to carry out the duty, and his reward is with Allah.

The Islamic Resistance Movement - Dimensions of Time and Place

Article Five

The temporal dimension of the Islamic Resistance Movement - in view of the fact that it has adopted Islam as its way of life - go back to the birth of the Islamic message and to the righteous early believers; Allah is its goal, the Prophet is its example to be followed, and Koran is its constitution.

Its spatial dimension: wherever there are Muslims who embrace Islam as their way of life, everywhere upon the earth. Thus, [Hamas] sends its roots deep into the ground, and it extends to embrace the heavens.

"Do you not see how Allah has given us a parable? A good word is like a good tree; its roots are firm and its branches extend to the heavens. It always bears its fruit at the right time in accordance with God's will. Allah recites parables to men so that they will take heed." (Koran, 14:24-25)

Distinctiveness and Independence

Article Six

The Islamic Resistance Movement is a distinct Palestinian movement that is loyal to Allah, adopts Islam as a way of life and works to raise the banner of Allah over every inch of Palestine. Under the wing of Islam, followers of other religions can all live safe and secure in their life, property and rights; whereas in the absence of Islam, discord arises, injustice spreads, corruption burgeons, and there are conflicts and wars. Allah bless the Muslim poet Muhammad Iqbal [6] who said:

When faith is gone, there is no safety,
And there is no life to him who has no religion.
He who is content to live without religion
Has taken death as a consort of life.

The Universality of the Islamic Resistance Movement

Article Seven

Muslims who adopt the way of the Islamic Resistance Movement are found in all countries of the world, and act to support [the movement], to adopt its positions and to reinforce its jihad. Therefore, it is a world movement, and it is qualified for this [role] owing to the clarity of its ideology, the loftiness of its purpose and the exaltedness of its goals. It is on this basis that it should be regarded and evaluated; it is on this basis that its role should be recognized. Whoever denies its rights, refrains from helping it, becomes blind [to the truth] and makes an effort to blot out its role - he is like one who attempts to dispute with [divine] predestination. Whoever closes his eyes to the facts, intentionally or unintentionally, will eventually wake up [to find that] events have overtaken him and that the [weight of the] evidence has rendered him unable to justify his position. Precedence shall be given to those who come first [to the movement]. The iniquity of one's own relatives is more painful to the soul than the blow of a sharp sword. [7]

"We have revealed to you the Book in truth, confirming the scripture that came before it and guarding it. Judge between them according to what Allah has revealed, and follow not their capricious will, turning away from the truth that was revealed to you. To each among you Allah has appointed a law and a way. If Allah had so desired, he would have made you a

single nation. However, he desired to test you in all that he had given you. So vie with one another in good works. It is to Allah that you shall all return, and He will then reveal to you [the truth] about the matters in which you differed." (Koran 5:48)

The Islamic Resistance Movement is one link in the chain of jihad in confronting the Zionist invasion. It is connected and linked to the [courageous] uprising of the martyr 'Izz Al-Din Al-Qassam and his brethren the jihad fighters of the Muslim Brotherhood in the year 1936. It is further related and connected to another link, [namely] the jihad of the Palestinians, the efforts and jihad of the Muslim Brotherhood in the 1948 war, and the jihad operations of the Muslim Brotherhood in 1968 and afterwards. Although these links are far apart, and although the continuity of jihad was interrupted by obstacles placed in the path of the jihad fighters by those who circle in the orbit of Zionism, the Islamic Resistance Movement aspires to realize the promise of Allah, no matter how long it takes. The Prophet, Allah's prayer and peace be upon him, says: "The hour of judgment shall not come until the Muslims fight the Jews and kill them, so that the Jews hide behind trees and stones, and each tree and stone will say: 'Oh Muslim, oh servant of Allah, there is a Jew behind me, come and kill him,' except for the Gharqad tree, for it is the tree of the Jews." (Recorded in the Hadith collections of Bukhari and Muslim).

The Motto of the Islamic Resistance Movement
Article Eight

Allah is its goal, the Prophet its model to be followed, the Koran its constitution, Jihad its way, and death for the sake of Allah its loftiest desire.

Chapter Two: Goals

Causes and Goals
Article Nine

The Islamic Resistance Movement has found itself in a period when Islam is absent from everyday life. Consequently, the balance has been disturbed, concepts have been confused, values have been altered, evil people have come into power, injustice and darkness have prevailed, the cowardly have become tigers, the homeland has been ravished, the people have been driven away and have been wandering in all the countries of the world. The rule of righteousness is absent, and the rule of falsehood prevails. Nothing is in its proper place. Thus, when Islam is absent, everything is transformed. These are the causes.

As for the goals, they are to fight falsehood, vanquish it and defeat it so that righteousness shall rule, the homeland shall return [to its rightful owner], and from the top of its mosques, the [Muslim] call for prayer will ring out announcing the rise of the rule of Islam, so that people and things shall all return to their proper place. From Allah we seek succor.

"If Allah did not ward off one group of people by means of another, the earth would certainly be in a state of disorder. Allah is most kind to all beings." (Koran, 2:251)

Article Ten

The Islamic Resistance Movement - while marching forward - offers support to all who are persecuted and protects all who are oppressed with all its strength. It spares no effort in upholding the truth and eradicating falsehood, in word and in action, here and in every place within its reach and its influence.

Chapter Three: Strategy and Means

The Strategy of the Islamic Resistance Movement
Palestine Is an Islamic Waqf [i.e., an Islamic religious endowment]
Article Eleven

The Islamic Resistance Movement maintains that the land of Palestine is *Waqf* land given as endowment for all generations of Muslims until the Day of Resurrection. One should not neglect it or [even] a part of it, nor should one relinquish it or [even] a part of it. No Arab state, or [even] all of the Arab states [together], have [the right] to do this; no king or

president has this right nor all the kings and presidents together; no organization, or all the organizations together - be they Palestinian or Arab - [have the right to do this] because Palestine is Islamic *Waqf* land given to all generations of Muslims until the Day of Resurrection.

This is the legal status of the land of Palestine according to Islamic law. In this respect, it is like any other land that the Muslims have conquered by force, because the Muslims consecrated it at the time of the conquest as religious endowment for all generations of Muslims until the Day of Resurrection. This is how it was: when the conquest of Al-Sha'm [8] and Iraq was complete, the commanders of the Muslim armies sent messages to the Caliph 'Umar b. Al-Khattab, asking for instructions concerning the conquered land - should they divide it up among the troops or leave it in the hands of its owners or what?

After discussions and consultations between the Caliph 'Umar b. Al-Khattab and the Companions of the Prophet, they decided that the land should be left with its [original] owners to benefit from its crops, but the substance of the land, that is the land itself, should constitute *Waqf* for all the generations of Muslims until the Day of Resurrection. The tenure of the owners is only tenure of usufruct. This *Waqf* will exist as long as the heaven and earth exist. Any measure which does not conform to this Islamic law regarding Palestine is null and void. "This surely is the very truth. Therefore, praise the great name of your Lord." (Koran, 56:95-96)

Homeland and Nationalism as Seen by the Islamic Resistance Movement
Article Twelve

Nationalism [9], as seen by the Islamic Resistance Movement, is part of the [Islamic] religious creed. There is nothing that speaks more eloquently and more profoundly of nationalism than the following: when the enemy tramples Muslim territory, waging jihad and confronting the enemy become a personal duty of every Muslim man and Muslim woman. A woman may go out to fight the enemy [even] without her husband's permission and a slave without his master's permission.

There is nothing like this in any other political system - this is an indisputable fact. Whereas the various other nationalist [ideologies] are connected to physical, human and regional factors, the nationalism of the Islamic Resistance Movement is [likewise] characterized by all of the above, and in addition - and most importantly - it is characterized by divine motives which endow it with spirit and life, since it is related to the source of the spirit, and to Him who gives life. [The Islamic Resistance Movement] is raising the divine banner in the skies of the homeland, so as to firmly connect heaven and earth.

When Moses came and cast down his rod
Both sorcery and sorcerer came to naught

"The right way stands out clearly from error; therefore, whoever renounces falsehood and believes in **Allah**, he has indeed grasped the firmest handhold, which never breaks, and Allah is Hearing and Knowing." (Koran, 2:256)

Peaceful Solutions, Initiatives and International Conferences
Article Thirteen

The initiatives, the so-called peace solutions, and the international conferences for resolving the Palestinian problem stand in contradiction to the principles of the Islamic Resistance Movement, for to neglect any part of Palestine is to neglect part of the Islamic faith. The nationalism of the Islamic Resistance Movement is part of its [Islamic] faith. It is in the light of this principle that its members are educated, and they wage jihad in order to raise the banner of Allah over the homeland.

"And Allah has full control over His affairs; but most people do not know." (Koran, 12:21)

From time to time there are calls to hold an international conference in order to seek a solution for the [Palestinian] problem. Some accept this [proposal] and some reject it, for one reason or another, demanding the fulfillment of some condition or conditions before they

agree to hold the conference and participate in it. However, the Islamic Resistance Movement - since it is familiar with the parties participating in the conference and with their past and current positions on the issues of the Muslims - does not believe that these conferences can meet the demands or restore the rights [of the Palestinians], or bring equity to the oppressed. These conferences are nothing but a way to give the infidels power of arbitration over Muslim land, and when have the infidels ever been equitable towards the believers?

"The Jews will never be content with you, nor will the Christians, until you follow their religion. Say: 'The guidance of Allah is the right guidance.' But if you follow their desires after the knowledge which has come to you, then you shall have no protector or guardian from Allah." (Koran, 2:120)

There is no solution to the Palestinian problem except by jihad. Initiatives, proposals and international conferences are a waste of time and a farce. The Palestinian people is far too eminent to have its future, its rights and its destiny toyed with. As stated in the Hadith: "The people of Al-Sha'm are [Allah's] rod in His land. Through them, He wreaks vengeance on whomever He wishes among His servants. The hypocrites among them are not allowed to be superior to the believers among them, and they shall die in grief and distress." (Recorded by Al-Tabarani with a chain of transmitters to Muhammad, and by Ahmad [Ibn Hanbal] with an incomplete chain of transmitters to Muhammad which may be the accurate record, the transmitters in both cases being trustworthy - Allah alone is omniscient).

The Three Circles Article Fourteen

The problem of liberating Palestine involves three circles: the Palestinian circle, the [pan-]Arab circle and the Islamic circle. Each of these three circles has its role in the struggle against Zionism and has its duties. It is a grave error and shameful ignorance to neglect any of these circles, for Palestine is an Islamic land. In it is the first of the two *qiblas* [directions of prayer] and the third most holy mosque, after the mosques of Mecca and Medina. It is the destination of the Prophet's nocturnal journey.

"Praise be to Him who carried His servant by night from the most sacred mosque to the farthest mosque whose surroundings We blessed, so as to show him Our signs. He is the One who is hearing and seeing." (Koran, 17:1)

This being the case, the liberation [of Palestine] is a personal duty of every Muslim, wherever he be. It is on this basis that one should consider the problem, and every Muslim should understand this. When the day comes and the problem is treated on this basis, and all the capabilities of the three circles are mobilized - the current circumstances will change and the day of liberation will draw near.

"You strike more fear in the hearts of the Jews than does Allah, because they are people who do not understand." (Koran, 59:13)

Jihad for the Liberation of Palestine is a Personal Duty Article Fifteen

The day the enemies conquer some part of the Muslim land, jihad becomes a personal duty of every Muslim. In the face of the Jewish occupation of Palestine, it is necessary to raise the banner of jihad. This requires the propagation of Islamic consciousness among the masses, locally [in Palestine], in the Arab world and in the Islamic world. It is necessary to instill the spirit of jihad in the nation, engage the enemies and join the ranks of the jihad fighters.

The indoctrination campaign must involve *ulama*, educators, teachers and information and media experts, as well as all intellectuals, especially the young people and the sheikhs of Islamic movements. It is [also] necessary to introduce essential changes in the curricula, in order to eliminate the influences of the intellectual invasion which were inflicted upon them by the Orientalists and the missionaries. This invasion came upon the region after Salah Al-Din Al-Ayyubi defeated the Crusaders. The Crusaders then realized that it is impossible to vanquish the Muslims unless the way is first paved by an intellectual invasion that would confuse the [Muslims'] thinking, distort their legacy and impugn their ideals. Only after this

[intellectual invasion] would there come invasion with troops. This [intellectual invasion] prepared the ground for the colonialist invasion, as [General] Allenby declared upon entering Jerusalem: "Now the Crusades have come to an end." General Gouraud stood at Salah AI-Din's tomb, and said: "Oh, Salah AI-Din, we are back!" Colonialism helped to intensify the intellectual invasion and helped it to take root. It still does. All this paved the way towards the loss of Palestine.

It is necessary to establish in the minds of all the Muslim generations that the Palestinian issue is a religious issue, and that it must be dealt with as such, for [Palestine] contains Islamic holy places, [namely] the Al-Aqsa mosque, which is inseparably connected, for as long as heaven and earth shall endure, to the holy mosque of Mecca through the Prophet's nocturnal journey [from the mosque of Mecca to the Al-Aqsa mosque] and through his ascension to heaven thence.

"Being stationed on the frontier for the sake of Allah for one day is better than this [entire] world and everything in it; and the place taken up in paradise by the [horseman's] whip of any one of you [jihad fighters] is better than this [entire] world and everything in it. Every evening [operation] and morning [operation] performed by Muslims for the sake of Allah is better than this [entire] world and everything in it." (Recorded in the Hadith collections of Bukhari, Muslim, Tirmidhi and Ibn Maja)

"By the name of Him who holds Muhammad's soul in His hand, I wish to launch an attack for the sake of Allah and be killed and attack again and be killed and attack again and be killed." (Recorded in the Hadith collections of Bukhari and Muslim)

Educating the Next Generations *Article Sixteen*

It is necessary to educate the next Islamic generations in our region in an Islamic way, based on the performance of the religious duties, attentive study of Allah's book, study of the Prophet's *sunna* [custom], perusal of Islamic history and legacy based on reliable sources under the instruction of experts and scholars, and reliance on methods which will produce a wholesome outlook in thought and in faith. In addition, it is necessary to closely study the enemy and his material and human capabilities, to become familiar with his weaknesses and strengths, to recognize the powers that assist and support him. It is also necessary to be familiar with current events, follow new developments and study the analyses and commentaries regarding them. It is likewise necessary to plan for the future and to study each and every phenomenon, so that Muslims engaged in jihad will live with full awareness of their purpose, goal and way, and [with full awareness of] what is happening around them.

"Oh my son! If [a thing] is but the weight of a grain of mustard, though it be in a rock, or in the heavens, or on earth, Allah will bring it forth. Allah discerns even the smallest thing; He is omniscient. Oh my son! Keep up prayer and enjoin the good and forbid the evil, and persevere whatever may befall you; surely this [behavior] is worthy steadfastness. Turn not thy cheek in scorn away from people; do not walk haughtily in the land. Allah does not love the arrogant and self-conceited." (Koran, 31:16-18)

The Role of Muslim Women *Article Seventeen*

The role of the Muslim woman in the war of liberation is no less important than that of the man, for she is the maker of men. Her role in guiding and educating the next generation is very important. The enemies have realized [the significance of] her role, and they believe that if they can educate her according to their wishes, guiding her away from Islam, they will have won the war. You find, therefore, that they continually make great efforts [to do this] by means of the media, the cinema and school curricula, through their agents who are incorporated in Zionist organizations that assume various names and forms such as the Freemasons, Rotary Clubs, espionage groups, etc. - all of which are dens of sabotage and saboteurs. These Zionist organizations have an enormous abundance of material resources, which enable them to play their game in [various] societies with the aim of realizing their purpose while Islam is absent from the scene and the Muslims are estranged [from their faith]. The followers of the Islamic movements [10] should fulfill their role in countering the

schemes of these saboteurs. When Islam is at the helm, it will totally eradicate these organizations, which are hostile to humanity and to Islam.

Article Eighteen

The woman in the jihadist home and family, as mother or sister, has the primary role in managing the household, raising the children according to the moral ideas and values inspired by Islam, and teaching them to perform the religious duties in preparation for the jihadist role that awaits them. Hence, it is necessary to pay close attention to the schools in which the Muslim girl is educated, and to their curricula, so that she will grow to be a good mother, conscious of her role in the war of liberation. She should have adequate awareness and understanding concerning the management of domestic affairs, since economy and avoiding wastefulness in family expenses are among the requirements in the ability to persist in the current difficult circumstances. She should ever be aware that available funds are like blood that must flow only in the veins for life to continue in both young and old.

"Muslim men and Muslim women, the believing men and women, the truthful men and women, the persevering men and women, the humble men and women, the charitable men and women, the fasting men and women, the men and women who guard their chastity, and the men and women who remember Allah frequently - for them Allah has prepared forgiveness and great reward." (Koran, 33:35).

The Role of Islamic Art in the War of Liberation *Article Nineteen*

Art has rules and standards by which it is possible to determine whether it is Islamic or pagan. The Islamic liberation is in need of Islamic art that uplifts the spirit without subjecting one aspect of human nature to another: but rather uplifts all aspects in [perfect] balance and harmony. Man is a marvelous and unique creature made from a handful of clay and a breath of spirit. Islamic art addresses man on this basis, while pagan art addresses the physical body and gives dominance to the component of clay.

Books, articles, pamphlets, sermons, epistles, traditional songs, poems, [patriotic] songs, plays, etc. - when they have the characteristics of Islamic art, they are among the necessary means of ideological indoctrination. [They constitute] self-renewing sustenance for continuing the journey and refreshing the spirit, for the road is long, the suffering is great and the souls grow weary. Islamic art renews the energies, revives motion and awakens the soul to lofty ideals and wholesome conduct.

Nothing heals the soul when it is in retreat save moving from mode to mode.

All this is utterly serious and no jest, for the nation engaged in jihad knows no jest.

Social Solidarity *Article Twenty*

Muslim society is characterized by solidarity. The Prophet, Allah's prayer and peace be upon him, says: "Blessed are the Banu Al-Ash'ar tribe. When they are afflicted with drought - whether in a town or on a journey - they would collect all that they have and divide it among themselves in equal shares." This is the Islamic spirit that should prevail in every Muslim society. A society which is facing a wicked enemy with Nazi behavior, that does not distinguish between men and women, old and young, has an even greater need to grace itself with this Islamic spirit [of solidarity]. Our enemy employs the method of collective punishment, depriving people of their homes and possessions. He pursued them [even] in their places of exile, breaking bones, shooting women, children and elderly people with or without reason. He established detention camps to imprison thousands and thousands [of people] in inhuman conditions, all this in addition to destroying houses, orphaning children and unjustly convicting thousands of young people to spend the best years of their youth in the darkness of prison. The Nazism of the Jews targeted both women and children. The terror they spread is directed at everyone. They fight people by destroying their livelihood, stealing their money and trampling their dignity. Their horrible treatment of people is like that of the worst war criminals. Deportation from one's homeland is a form of murder. In the face of

such behavior, we must have social solidarity among the people, and we must face the enemy as one body, which, when one of its limbs is in pain, the rest of it reacts with sleeplessness and fever.

Article Twenty-one

Social solidarity means offering help to everyone who is in need, be it material or moral, or joining with him to complete some work. Members of the Islamic Resistance Movement should regard the interests of the masses as their own, and they should spare no effort to achieve them and protect them. They must prevent reckless playing with matters affecting the future of the next generations or causing losses to their society. The masses are of them and for them, and the strength of the masses is strength for them; their future is theirs. The members of the Islamic Resistance Movement should be with the people on joyous occasions and at times of grief. They should espouse the demands of the masses and strive to serve the masses' interests, which are indeed their own. When this spirit prevails, friendship will deepen and there will be cooperation and empathy, unity will increase and the ranks will be strengthened to confront the enemies.

The Forces which Support the Enemy

Article Twenty-Two

The enemies have been planning expertly and thoroughly for a long time in order to achieve what they have achieved, employing those means which affect the course of events. They strove to accumulate huge financial resources which they used to realize their dream.

With money they have taken control of the world media - news agencies, the press, publishing houses, broadcasting services, etc. With money they sparked revolutions in various countries around the world in order to serve their interests and to reap profits. They were behind the French Revolution and the Communist Revolution and [they are behind] most of the revolutions about which we hear from time to time here and there. With money they have formed secret organizations, all over the world, in order to destroy [those countries'] societies and to serve the Zionists' interests, such as the Freemasons, the Rotary Clubs, the Lions, the Sons of the Covenant [i.e. B'nei B'rith], etc. All of these are organizations of espionage and sabotage. With money they were able to take control of the colonialist countries, and [they] urged them to colonize many countries so that they could exploit their resources and spread moral corruption there.

There is no end to what can be said about [their involvement in] local wars and world wars. They were behind World War I, through which they achieved the destruction of the Islamic Caliphate, reaped material profits, took control of numerous resources, obtained the Balfour Declaration, and established the League of the United Nations [sic] so as to rule the world through this organization. They were [also] behind World War II, through which they reaped enormous profits from commerce in war materials and paved the way for the establishment of their state. They [also] suggested the formation of the United Nations and the Security Council to replace the League of the United Nations [sic] and to rule the world through this [new organization]. Wherever there is war in the world, it is they who are pulling the strings behind the scenes. "Whenever they ignite the fire of war, Allah extinguishes it. They strive to spread evil in the land, but Allah does not love those who do evil." (Koran, 5:64)

The colonialist powers, both in the capitalist West and the communist East, support the enemy with all their might, both materially and with manpower, alternating one with the other [in giving support]. When Islam appears, all the forces of unbelief unite to oppose it, for all unbelief is one denomination.

"Oh you who believe, do not take as your intimate friends those outside your ranks, for they will spare no effort to harm you. They desire that which causes you suffering. Hatred has indeed come out of their mouths, but what they hide in their hearts is even worse. We have given you clear signs, if you understand" (Koran, 3:118). It is not for nothing that the verse ends with His words "if you understand."

Chapter Four - Our Positions on:

A. The Islamic Movements
Article Twenty-Three

The Islamic Resistance Movement looks on the other Islamic movements with respect and appreciation, for even if it is at variance with them in some given respect or thought, it agrees with them in many more respects or thoughts, and it views them - so long as their intentions are good and they are devoted to Allah - as falling under the rubric of legitimate opinion, that is, as long as their actions are within the bounds of the Islamic circle. Everyone who strives for truth receives his reward.

The Islamic Resistance Movement considers these movements as reinforcing it, and asks [Allah] to guide and direct us all. It never forgets to constantly raise the banner of unity and to strive assiduously to achieve unity in accordance with the Koran and the *sunna*. "Hold fast to Allah's rope, all of you. Do not be divided among yourselves, and remember Allah's favor to you. When you were enemies to one another, He brought your hearts together, and through his favor you became brothers. You were on the brink of a pit of fire, and He saved you from it. Thus Allah shows you His signs, so that you may follow the right way." (Koran, 3:103) [11]

Article Twenty-Four

The Islamic Resistance Movement does not allow to impugn or to blacken the name of individuals or groups, for [true] Muslims do not impugn or curse others. One should make a clear distinction between this and positions or behavior, for the Islamic Resistance Movement does have the right to expose error and to deter people from it and to strive to make the truth known and to adopt it in an impartial way in every given case. Wisdom is what the Muslim looks for, and he takes it wherever he finds it. [12]

"Allah does not like it when people speak ill in public, except for those who have been wronged. Allah hears all and knows all. When you do good openly, or in secret, or forgive a wrong [done to you], surely Allah is Forgiving and Almighty." (Koran, 4:148-149)

B. The Nationalist Movements in the Palestinian Arena
Article Twenty-Five

[The Islamic Resistance Movement] respects them and appreciates the conditions that surround and affect them. It supports them as long as they do not pay allegiance to the Communist East or to the Crusader West, and it emphasizes to all the members and supporters [of these movements] that it is a jihadist, ethical movement, conscientious in its worldview and in its treatment of others. It abhors opportunism, wants only good for the people, both as individuals and as groups, and does not strive to attain material gain or fame for itself. It does not seek reward from people, and it goes forth with its own resources and what it has at hand - "Muster against them all the force you can" (Koran, 8:60) - in order to carry out the duty and win Allah's favor. It has no desire other than that.

It reassures all the nationalist [groups] of all orientations that are operating in the Palestinian arena for the liberation of Palestine that it shall never be anything other than a support and an aid for them, in word and in deed, at present and in the future. It joins together and does not separate, preserves and does not scatter, unites and does not divide, it values every kind word, every sincere effort and every praiseworthy endeavor. It closes the door in the face of petty disagreements. It pays no heed to rumors and biased remarks, but is fully aware of [its] right to defend itself.

Anything that opposes or contradicts this orientation is fabricated by the enemy or by their lackeys in order to cause confusion, divide the ranks and create distraction with side issues. "OH you who believe, if an evildoer brings you information [about any person], you should examine it carefully lest you hurt [innocent] people out of ignorance, and afterwards come to regret it." (Koran, 49:6)

Article Twenty-Six

The Islamic Resistance Movement - looking favorably as it does on the Palestinian nationalist

movements - does not refrain from discussing new developments concerning the Palestinian problem in the local and international arena in an objective manner, so as to find to what extent [these developments] agree or disagree with the national interests in the light of the Islamic vision.

C. The Palestine Liberation Organization
Article Twenty-Seven

The Palestine Liberation Organization [PLO] is closest to the heart of the Islamic Resistance Movement. [We regard it as] a father, brother or friend, and a true Muslim does not spurn his father, his brother or his friend. Our homeland is one, our misfortune is one, our destiny is one and we share the same enemy.

Owing to the circumstances that surrounded the establishment of the PLO, and [owing to] the intellectual confusion which prevails in the Arab world as a result of the intellectual invasion to which it has been subject since the defeat of the Crusaders, and which was intensified, and continues to be intensified by Orientalism and Christian missionary activities - the PLO has adopted the idea of the secular state, and we view [the PLO] accordingly. Secularist ideology stands in total contradiction to the religious ideology, and it is ideas which are the basis of positions, behavior and decisions.

Hence, with all our appreciation for the Palestine Liberation Organization and what it may yet become, and without belittling its role in the Arab-Israeli conflict, we cannot give up the Islamic identity of Palestine in the present and in the future to adopt the secularist ideology - for the Islamic identity of Palestine is part of our faith, and whoever is lax with his faith is lost. "Who spurns the religion of Abraham but one who has made himself into a fool?" (Koran, 2:130)

When the PLO adopts Islam as its way of life, then we shall be its troops and the fuel for its fire that will burn the enemies. But until this time comes - and we pray to Allah that it be soon - the position of the Islamic Resistance Movement vis a vis the PLO is that of a son towards his father, a brother towards his brother or a relative towards his relative. He shares the other's pain when he is pricked by a thorn, and supports him in facing the enemy, and he wishes for him to find divine guidance and [follow] the right path.

Your brother, your brother before all others! He who has no brother
 Is like one who goes to war unarmed.
 Your cousin, you must know the strength of his wing,
 For how can the falcon rise up without wings? [13]

D. Arab and Islamic States and Governments
Article Twenty-Eight

The Zionist invasion is a cruel invasion, which has no scruples whatsoever; it uses every vicious and vile method to achieve its goals. In its infiltration and espionage operations, it greatly relies on secret organizations which grew out of it, such as the Freemasons, the Rotary Clubs, the Lions and other such espionage groups. All these organizations, covert or overt, work for the interests of Zionism and under its direction, and their aim is to break societies, undermine values, destroy people's honor, create moral degeneration and annihilate Islam. [Zionism] is behind all types of trafficking in drugs and alcohol, so as to make it easier for it to take control and expand.

We demand that the Arab countries around Israel open their borders to jihad fighters from among the Arab and Islamic peoples, so they may fulfill their role and join their efforts to the efforts of their brothers - the Muslim brethren in Palestine. As for the rest of the Arab and Muslim countries, we demand that they facilitate the passage of the jihad fighters into them and out of them - that is the very least [they can do].

We should not fail to remind every Muslim that when the Jews occupied the Sacred place [i.e., Jerusalem] in 1967 and stood on the threshold of the blessed Al-Aqsa mosque, they shouted: "Muhammad is dead; his offspring are women." Israel with its Jewish identity and Jewish people is challenging Islam and the Muslims. May the cowardly know no sleep.

E. Nationalist and Religious Groups and Organizations, Intellectuals, and the Arab and Islamic world
Article Twenty-Nine

The Islamic Resistance Movement hopes that these groups will stand by it in every respect, help it, espouse its positions, back its activities and strive to enlist support for it, so that the Muslim peoples will be a support and a reinforcement for it, and [will provide] strategic depth on all levels: [in terms of] human and material resources, information, in every time and every place. [This should be done] by holding conferences, publishing ideological pamphlets, and by indoctrination of the masses with regards to the Palestinian issue - what is facing [the Palestinians] and what is plotted against [them]. [Likewise they should work to] mobilize the Islamic peoples, ideologically, educationally and culturally, so that they will play their role in the decisive war of liberation just as they did in defeating the Crusaders and routing out the Mongols, thus saving human civilization. This is not difficult for Allah.

"Allah has decreed: 'I and My messengers shall prevail'; Allah is strong and all-powerful." (Koran, 58:21)

Article Thirty

Writers, intellectuals, media people, preachers in mosques, educators and all the various sectors in the Arab and Islamic world, are all required to fulfill their role and perform their duty. [This is necessary] due to the ferocity of the Zionist onslaught and the fact that it has infiltrated many countries and has taken control of the finances and media - with all the ramifications that follow from this - in most countries of the world.

Jihad is not limited to wielding arms and fighting the enemies face to face, for eloquent speech, persuasive writing, effective books, support and help - when [they are] performed with the sincere intention that Allah's banner will reign supreme - all constitute jihad for the sake of Allah.

[As the prophet said:] "Whoever equips a warrior fighting for the sake of Allah is [himself] a warrior, and whoever supports the family of a warrior [who has set out to fight for the sake of Allah] is [himself] a warrior." (Recorded by Bukhari, Muslim, Abu Da'ud and Tirmidhi in their Hadith collections).

F Followers of the Other Religions
The Islamic Resistance Movement is a Humane Movement
Article ThirtyOne

The Islamic Resistance Movement is a humane movement which respects human rights and is committed to the Islamic tolerance towards the followers of the other religions. It is hostile only to those among them who display hostility towards it or stand in its way, hampering its activities and foiling its efforts. Under the wing of Islam, the followers of the three religions - Islam, Christianity and Judaism - can co-exist in security and safety. It is only under the wing of Islam that safety and security prevail. Recent and ancient history provide the best evidence for this. The followers of the other religions should stop competing with Islam for sovereignty in this region, because, when they rule, there is nothing but carnage, torture and deportation, and they cannot get along with their own, let alone with followers of other religions. Both the present and the past are full of evidence for this.

"They do not fight you together, except from within fortified villages, or from behind walls. They fight fiercely with one another. You consider them to be united, but their hearts are divided, for they are a people with **no** sense." (Koran, 59:14)

Islam accords to every person his rights, and prevents any infringement on other people's rights. The Nazi Zionist measures against our people will not succeed in prolonging the duration of their invasion, for the rule of injustice lasts but one hour, while the rule of the truth will last until the Hour of Resurrection.

"Allah does not forbid you to show kindness and act justly towards those who do not fight you on account of your religion, and do not drive you from your homes. Allah loves those who act

justly." (Koran, 60:8)

G. The Attempt to Isolate the Palestinian People
Article Thirty-Two

World Zionism and the colonialist powers attempt, by clever maneuvering and meticulous planning, to pull the Arab states, one by one, out of the circle of the conflict with Zionism, so as to ultimately isolate the Palestinian people. It has already taken Egypt out of the circle of conflict to a large extent through the treacherous Camp David Accords [of September 1978], and it is trying to pull additional [Arab] countries into similar agreements so that they leave the circle of conflict.

The Islamic Resistance Movement calls upon all the Arab and Muslim peoples to strive seriously and diligently to prevent this horrible scheme, and to alert the masses to the danger inherent in leaving the circle of the conflict with Zionism. Today it is Palestine, and tomorrow some other country or countries, for the Zionist plan has no limits, and after Palestine they want to expand [their territory] from the Nile to the Euphrates, and when they finish devouring one area, they hunger for further expansion and so on, indefinitely. Their plan is expounded in *The Protocols of the Elders of Zion*, and their present [behavior] is the best proof for what we are saying.

Leaving the circle of the conflict with Zionism is an act of high treason; all those who do this shall be cursed. "Whoever [when fighting the infidels] turns his back to them, unless maneuvering for battle or intending to join another [fighting] company, he incurs Allah's wrath, and his abode shall be hell. Most unfortunate is his fate." (Koran, 8:16)

All forces and capabilities must be pooled to confront this ferocious Mongol, Nazi onslaught, lest homelands be lost, people be exiled, evil spread on the earth and all religious values be destroyed. Each and every person should know that he is responsible to Allah.

"Anyone who does a grain's weight of good shall see it, and anyone who does a grain's weight of evil shall see it." (Koran, 99:7-8)

In the circle of the conflict against world Zionism, the Islamic Resistance Movement sees itself as a spearhead or as a step forward on the road [to victory]. It joins its efforts to the efforts of all those who are active in the Palestinian arena. It now remains for **steps** to be taken by the Arab and Islamic world. [The Islamic Resistance Movement] is well qualified for the upcoming stage [of the struggle] with the Jews, the warmongers.

"We have planted enmity and hatred among them [i.e., among the Jews] until the Day of Resurrection. Every time they kindle the fire of war, Allah extinguishes it. They strive to spread evil upon the earth, and Allah does not love those who do evil." (Koran, 5:64)

Article Thirty-Three

The Islamic Resistance Movement - proceeding from these general concepts which are in harmony and agreement with the laws of nature, and following the current of divine destiny towards confrontation with the enemies and jihad against them in defense of Muslims, Islamic civilization and Islamic sanctities, primarily the Al-Aqsa mosque - calls on the Arab and Islamic peoples and their governments, and on their NGOs and official organizations, to fear Allah in their attitude toward the Islamic Resistance Movement and in their treatment of it. They should act towards it as Allah wants them to, namely back it, support it, assist it and continuously reinforce it, until Allah's word is fulfilled. Then the ranks will all be united, jihad fighters will join other jihad fighters, and the masses all over the Islamic world will rush out and answer the call of duty, shouting: "Hasten to jihad!" This call will penetrate the clouds in the sky and continue to ring out, until liberation is accomplished, the invaders are defeated and Allah's victory is revealed.

"Allah surely helps whoever helps Him; Allah is strong and mighty." (Koran, 22:40)

Chapter Five: Historical Evidence throughout the Generations regarding Confrontation with Aggressors

Article Thirty-Four

Palestine is the center of the Earth and the meeting place of the continents; it has always been the target of greedy aggressors. This has been the case since the dawn of history. The Prophet, Allah's prayer and peace be upon him, points to this in his noble words with which he addressed his exalted companion, Mu'adh b. Jabal, saying: "Oh Mu'adh, Allah will give you the land of Al-Sha'm after my death, from Al-'Arish to the Euphrates. Its men, women and handmaids will be [constantly] stationed on the frontier until the Day of Resurrection, for any one of you who chooses [to live in] some part of the coastal plains of Al-Sha'm or Bayt Al-Maqdis [i.e., Palestine]: will be in a [constant] state of jihad until the Day of Resurrection."

The aggressors coveted Palestine on many occasions. They attacked it with great armies in attempt to realize their greedy aspirations. The great armies of the Crusaders came there, bringing their religious creed and hoisting their cross. They managed to defeat the Muslims for a while, and the Muslims only managed to regain it when they fought under their religious banner, joined forces crying "*Allah Akbar*," and set forth in jihad under the command of Salah Al-Din Al-Ayyubi for nearly two decades, which led to a clear victory: the Crusaders were defeated and Palestine was liberated.

"Say to the unbelievers: You will surely be defeated and gathered in Hell. Most terrible shall be your resting-place." (Koran, 3:12)

This is the only way to liberation, and one cannot doubt the testimony of history. This is one of the rules of the universe and the laws of reality. Only iron can break iron, and their false, fabricated faith can only be overcome by the true faith of Islam, for religious faith cannot be attacked except through religious faith. And truth shall eventually triumph, for truth is the strongest.

"We have already given Our Word to Our servants, the messengers, that they would be helped to victory and that Our army will triumph." (Koran, 37:171-173)

Article Thirty-Five

The Islamic Resistance Movement studies the defeat of the Crusaders at the hands of Salah Al-Din Al-Ayyubi, the liberation of Palestine from them, as well as the defeat of the Mongols at 'Ayn Jalut and the breaking of their military strength at the hands of **Qutuz** and Al-Zahir Baybars, and the delivery of the Arab world from the Mongol conquest which destroyed all aspects of human civilization. [14] [The Islamic Resistance Movement] studies these [events] seriously, and draws lessons and examples from them. The current Zionist invasion was preceded by Crusader invasions from the west, and by Mongol invasion from the east. And just as the Muslims faced these invasions, made plans for fighting them and defeated them, they can [now] confront the Zionist invasion and defeat it. This not difficult for Allah, providing that intentions are sincere and resolve is strong, and that Muslims draw benefit from the experiences of the past, shed off the influences of the intellectual invasion, and follow the ways of their predecessors.

Conclusion: The Islamic Resistance Movement- Soldiers [for the Cause]

Article Thirty-Six

The Islamic Resistance Movement, in its march forward, repeatedly emphasizes to all members of our people and of the Arab and Muslim peoples that it is not seeking fame for itself, or material gain, or social status, and that it is not aimed against any of our own people in an attempt to compete with them or to take their place - nothing of the kind. It does not oppose any Muslim, or any non-Muslim who is peaceful towards it, here [in Palestine] or elsewhere. It will always offer nothing but help to all groups and organizations that strive against the Zionist enemy and against its lackeys.

The Islamic Resistance Movement adopts Islam as its way of life. [Islam] is its creed and its law. [Any group that] adopts Islam as its way of life, here or elsewhere - be it an organization, association, state or any other group - the Islamic Resistance Movement will serve as its

EXHIBIT 6

2

October 1992

Internal Memo of Palestine Committee

Discussions **of** Jews being the enemy everywhere **and** a true jihadist view of the world.

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One: Introduction:

Islam entered Palestine as it entered other parts of the earth. Palestine was honored by it and it lived under its shadow a while in time. To it, the best of the creation, God's prophet, peace be upon him, was journeyed and in it, the best of the humans led God's prophets, peace be upon them, in a prayer and a submission to the God of heavens and earth. And from it, he was taken to celestial galaxy where the Capable God is. Palestine is the blessed land whose dust was trodden by the horses of the Muslim conquerors and which was blessed by the arrival of Caliph Omar to receive the keys of Jerusalem. Palestine is the land which was protected and preserved by Muslims in the Rashidian, the Omniades and then the Abbasi Dynasties. Palestine is the one whose land leader hem Saladin cleansed from the defilement of the Crusaders and on whose land the triumphant leader Qotoz conquered the invaders.

Palestine is a land which God the Almighty has honored with the blood of the Companions which watered its soil, chartering a path on which all great heros such as al-Qassam, al-Husseini, al-Zeer, Jamjourn and al-Sa'adi and other Muslim grand men marched. Palestine is the land which moved from one honor to another by the arrival of representatives of the 20th century innovator, martyr Imam Hassan al-Banna, and they transferred to it the Muslim Brotherhood Movement and branches for the Ikhwan were formed in the cities of Palestine in the early 40's. Palestine is the one for which Muslim Brotherhood prepared armies - made up from the children of Islam in the Arab and Islamic nations - to liberate its land from the abomination and the defilement of the children of the Jews and they watered its pure soil with their honorable blood which sprouted into a Jihad that is continuing until the Day of Resurrection and provided a zeal without relenting making the slogan of its children "It is a Jihad for victory or martyrdom".

The Muslim Brotherhood Movement has cared for all the issues of Muslims considering that they are all one nation. And he who did not care about the issues of Muslims is not one of them as the chosen one said, God's prayers are upon him.

Yet, we noticed the concern of the Movement for the cause of Palestine from its early beginnings and it enjoyed a special care from Guide Hassan al-Banna, may God rest his soul. This special care is founded upon two main characteristics which the Palestinian cause enjoy separate from other Muslims' issues:

The 1st characteristic: is the fact that Palestine is a cause with a special Islamic status as it has Al-Aqsa mosque, third among the mosques which are to be visited. And it has the honorable Rock. It is the land of the Night Journey and the Ascension. It is the land of the great crowd and it is a holy and a blessed land according to the text of Noble Quran. Its land was watered with the blood of the martyrs from the Companions, the Followers and others along the ages. It has also graduated genius scholars such as al-Shafei, al-Nabolsi, al-Ajlouni and others.

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The 2nd characteristic: comes from the fact that the struggle is with the Jews who do not constitute a danger to Palestine alone, but a danger to Arabs and Muslims in their homelands, resources, religion, traditions, influence and political entity. Due to the Jewish influence in different global nations specially America and Europe, the struggle in Palestine has a degree of entanglement and complexity, or junctions and contradictions between international politics like no other cause in the world. Due to this entanglement and complexity, no Arab or Muslim nation or a nation with an impact on international politics has not been affected by this struggle either negatively or positively.

These two characteristics make the cause of Palestine a unique cause which requires a unique method and means to manage the struggle as well. This is what the Islamic Movement - the Muslim Brotherhood - has realized. Therefore, it paid a special attention to the cause of Palestine and established a special apparatus for it which requires support and assistance from all the Brotherhood's movements.

Two: The Foundation of Islamic Action for Palestine:

The "worry for Palestine" and the liberation of the homeland and the worshipers in it has not been a passing worry in the soul, mind and programs of the Islamic Movement, but it has been a true and a sincere worry even if it took on several shapes and went through different stages.

Years after their march of building and educating the desired Muslim generation, and after about four decades, The Muslim Brotherhood in Palestine have realized that there is no escape the unity merger between the two branches of the Muslim Brotherhood in Jordan and Palestine and this was in the beginning of 1978 after the leadership of the Movement then realized that action for Palestine requires the unity of the Muslim nation and that this unity must be preceded by the unity of Islamic action. Thus, came the first initiative which was the foundation of the Muslim Brotherhood in the Shamm Countries. The Brotherhood action for Palestine through the Shamm countries went through several stages with positives and negatives in every stage.

A- The Palestine Section:

At the end of the seventies, the Shamm Countries Movement opened a new section which was called "The Palestine Section" to oversee the affairs of the Ikhwan inside the Occupied Territories. It was considered the liaison between the followers of the Movement inside and outside.

In the beginning of the eighties, the Islamic action for Palestine experienced distinguished leaps. At the inside level, groups and apparatuses were formed to confront the Zionist enemy and they carried different names then such as "The Palestinian Mujahedeen" and other names. At the outside level, a number of associations, Islamic youths and students unions were formed to ally

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the masses in order to render the **Palestinian cause victorious**. Therefore, the Islamic Association for Palestine's Students in Kuwait, the Islamic Association for **Palestinian Youths in Britain**, the Islamic Association for Palestine in **North America** and Muslim **Palestinian Youths** Association in Germany and others were **founded**.

B- Palestine Conference:

In October 1983, the first conference for Palestine at the Shamm countries level **was organized**. Based on the recommendations of this conference and the feelings of the Ikhwan in the executive office of the importance of paying a special **attention to** Palestinian **action**, a **decision was made to** broaden the powers of the Palestine Section and to reorganize it to be called "The **General** Apparatus for Palestine" in the fall of 1985.

C- The Central Committee for Associations and Palestinian Students Unions:

In the same year, 1983, the Movement established an organizational **frame** which encompasses **all these** Palestinian associations and unions and coordinates **between them** to serve the same cause, A Shura Council **was formed** for this frame and an **executive** committee to oversee its financial, administrative and planning affairs. This **was done** following an agreement and a blessing from the Muslim Brotherhood in the **Shamm Countries** and the Guidance Office of the International Movement.

D- Palestine Committees in the countries:

With the growth of the blessed Intifada and the spread of the **spirit of** Jihad amidst the children of Palestine and the nation, it became incumbent upon the **remainder of the Ikhwan branches** to play a role in attributing this Intifada and this Islamic action to Palestine. Therefore, a resolution **was** issued by the Guidance Office and the Shura **Council** of the International Movement to **form** "Palestine Committees" in all the Arab, the Islamic and the Western nations whose job is to make the Palestinian **cause** victorious and to support it **with what** it **needs** of **media, money, men** and all of that. (Refer to the resolution in the supplement).

Three: a- The Islamic Resistance Movement:

With the increase of the Intifada and the advance of the Islamic action inside and outside Palestine, the Islamic Resistance Movement (**Hamas**), provided **through its activities in resisting** the **Zionist** occupation a lot of sacrifices from **martyrs**, detainees, **wounded**, injured, fugitives and deportees and it **was** able to prove that it is an original and an effective movement in leading the Palestinian people. This Movement - which was bred in the bosom of the **mother** movement, "The Muslim Brotherhood" - restored hope and life to the Muslim **nation** and the notion that the flare of Jihad **has** not died out and that the banner of Islamic Jihad is still raised.

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But, the law of God the Almighty which does not change or alter willed that the Movement go through harsh consecutive trials which **started** in 1989 **as** the leadership of the Movement **was** arrested and held in prison where it still is, followed by the second and the third leaderships in consecutive **months**. But, God the Almighty **has** made available to the blessed Movement generations of leaders who were prepared for such days and such circumstances. Due to the successive **strikes** and continuous arrests in the ranks of the leaders in particular, the General Apparatus for Palestine became the acting central leadership for the Islamic Resistance Movement (**Hamas**) in the inside **and** the outside.

b- The Organizational Structure of the Movement:

The organizational structure consists of two organizations which **are**:

1- The Consultive Council: It includes 50 **members** from the inside and the outside, representatives of the International Office of Guidance **and** Shura and representatives of the executive office **and** the Shura Council for **the Shamm** countries in addition to a **number** of distinguished Brotherhood personalities in the **Arab and Muslim** nations.

2- The Executive Committee: It includes 11 **members** who lead the Islamic action for Palestine **in the inside and** the outside. Many technical and specialized committees in the fields of politics, media, finance are led by them **as well as** a number of organizations and **centers** which serve the goals of the general apparatus **and** the resistance movement in the inside and the outside.

And the Movement (Hamas) is represented in several of the leadership councils which **are** affiliated with the Guidance Office. They are:

- 1- The Shura Office of **the** International Movement.
- 2- The Guidance Office.
- 3- The Guidance Office for the **Shamm** countries.
- 4- The Executive Office for the **Shamm** countries.

The Movement submits to these entities reports, studies, plans, bylaws and work projects for approval **and** signature or modifications and guidance. Several resolutions relating to the cause and the Movement have been made which we will mention in the next items, **God's** willing.

C- The relationship of the Movement and its offices:

With **the** broadening of the Movement, the increase of the resistance and the political weight the Movement began to experience due to its stands, statements, relationships **and** projects, it opened several political offices in some of the Arab and Islamic **countries**. The

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Movement has **reached** a number of dual and collective agreements through its continuous meetings with the Palestinian factions, the Islamic **and** the nationalistic **among** them. It still hopes to continue **to increase** the scope of its relationship with all Arab, Islamic and international **sides and** fields.

Four: Some of the resolutions reached by the Guidance Office regarding the Palestinian Cause:

To affirm the status of the cause on the agenda of the **Ikhwan** in the General Guidance **Office**, they have reached **a number** of resolutions, **most** important of which **are**:

1. Supporting the continuation of the Intifada.
2. The Ikhwan in the countries are to hold **fundraising** campaigns to **support** the **Intifada**.
3. The Guidance Office is to **adopt** a policy which affirms that the Palestinian **cause** is the grand **central** cause **to** all the Muslim **Ikhwan** in the world.
4. Notifying the **countries** that the Palestine Section which is affiliate with the **Shamm countries** is the one in charge of action for the Palestinian cause. No other entity **is** to be listened to regarding this cause.
5. The cause of Palestine is the cause of the Movement and is given the **proper** attention **through its** organizations considering **that** the Palestine Section is **a** part of the **Shamm countries** movement.
6. Stressing **to** the countries the need to form special committees for Palestine in each **country**.
7. Notifying the countries to provide the following according to the vision of **the** general apparatus for Palestine, according to their ability and in coordination **with the apparatus** while documenting it with the countries:
a- Media support b- Political support c- Financial support.
8. Organizational **support** to facilitate communication with **the Ikhwan** of the Shamm countries in their **organizations and** to pass the programs for internal mobilization **to** the remainder of **the Ikhwan**.
9. Benefitting from the Ikhwan's relationships in all fields with **the** various **factions** in the **countries**.
10. The completion of formation of Palestine committees in all the countries and giving attention to holding conferences relating to Palestine while publicizing **and focusing** on the savagery of the Jews.
11. Asking the countries to contact the international organizations and **boards to denounce** the **crimes** of the Jews in Palestine.
12. Forming **an** international Islamic front for the cause of Palestine.
13. Developing the work of Palestine committees in all the countries **and** forming committees for Palestine in the countries **where** they are not **formed yet**.
14. Calling **upon** all the **Ikhwan** to increase financial **support from** them and from others **so** that the brothers in charge of the Palestine action can **fulfill** the work **requirements**.

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15. Holding conferences to make Al-Aqsa and Palestine victorious **and** to fight surrendering solutions.
16. Reviving the Palestinian cause with the public opinion **by** issuing edicts and giving speeches and lectures.
17. Asking the countries to increase the financial and the moral support for Hamas.

Five: Islamic Action for the Palestinian Cause in North America:

Like other Western, Arab **and** Islamic arenas, the **American** arena **has** seen **a** move for **action** for the Palestinian cause by the grace of God and due to the presence of the Islamic Movement and its pioneer the Muslim Brotherhood Movement. The first organizational frame for Islamic action for Palestine **came** in the beginning of the eighties when the leadership of the Movement decided to establish "The Islamic Association for Palestine in **Noah** America". The Association **was** and still **is** the general field through which the Movement expresses its view and positions regarding the Palestinian cause. When work developed, the Intifada **started** and the Islamic Resistance Movement (Hamas) **was** formed and the **general** apparatus for Palestine developed, and in light of the resolutions of the Guidance Office and the **Shura** Council of the International Movement to form Palestine committees in all the countries. the General Director of **the** apparatus came and met with the leadership of the Movement in America in 1988. **After** discussions **and** agreement, a "Palestine Committee" was formed **under** **the** supervision of the executive office. The Committee was then tasked with supervising all the organizations which serve the plan of the Movement domestically and internationally in addition to the Palestinian cause. Among these organizations were "The Islamic Association", "the Occupied Land **Fund**" **and** "The United Association". Like other directors of the Movement's committees **and** sections, the director of Palestine Committee is to submit periodical **reports** and adheres to the directions and the guidance of the leadership of the Group.

The president of the Islamic Association for Palestine is considered **a member** in the youths organizations section which is affiliated with the executive office and is treated like other organizations (such **as** the Association, the Students' Society and the Malaysian Students' Society...). The Association presents its plan and budget (which includes opening new branches for The Association. holding festivals, conferences and such things) like other organizations to the section to approve it and then implement it.

Six: The essence and the needed role:

After the previous presentation about the historical status of Palestine and the importance of liberating the blessed land, the land of the Night Journey and the Ascension, the **first** prayer niche and the third holiest site, after the presentation about the developments of Islamic action for this cause, the role of the Islamic Movement and - and on top of it, **the** Muslim Brotherhood - with all pride and cherish, and after mentioning some of the resolutions **reached** by the highest organizational authority within the Muslim Brotherhood Movement represented by

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the Shura Council **and** the Guidance Office of the International Movement, after all **this** presentations, a reader might pose a question: Why this **memo**? **And** why **now**?

*** As for why this memo?**

It is in order to tell **our** brothers and our beloved, the children of this blessed call, that their cause, Palestine, **has** not been forgotten and that it is always the number one item on the meeting agenda of **the** Guidance Office and the International Shura Council, and in order to tell our Palestinian brothers in particular that we are with **them as** their cause and the duty to serve it is not for them alone, but that **we** compete **with** them in it hoping for the reward and **the** recompense, **and** hoping **to** receive martyrdom on the soil of the holy land **and** in the shadows of Al-Aqsa mosque.

Also, to tell **our** brothers and beloved ones, **the** children of **this** great call **from** the different nationalities, that ow dealing with the Palestinian cause is not **from** a national or regional prospective - far be it from us - but it is mandated by Islam **and** the creed in order **to** move, exert effort **and** **are** not meager.

*** As for why now?**

It is order to confirm **to all**, Palestinians and other nationalities (which we never believed in or recognized them **as** they **are** just mere geographical divisions **and** nothing more) that unity and cohesion of one Islamic-Ikhwan wall in face of the conspiracy to sell Palestine and to hand over Jerusalem to God's enemy and our enemy, **all** of which in exchange for a submissive, fragile administrative self-rule, is needed today more **than** any past day.

The Palestinian cause - or **say** the Islam's cause in Palestine - **needs** today **an** effective **and** **a** distinguished role for the **grand** Islamic Movement **as** one fortified wall behind its leadership represented **by** the Shura Council and a **strong** support for their tool and striking wing, **the** Islamic Resistance Movement (Hamas).

To conclude this **memo**, we stress to **our** brothers the need to stand behind **this** blessed Islamic action **so** that God the Almighty **make** it, or make available to us through it, a field for Jihad in which we teach the enemies of God the lessons of prophets **and** Mujahedeen in triumphing over them or **martyring** for the **sake** of God.

And God is provider of success.

EXHIBIT 7

EXHIBIT 8

EXHIBIT 9

FILED

MAR 29 2005

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIACOUNCIL ON AMERICAN ISLAMIC)
RELATIONS, INC.,)
)
Plaintiff,)

v.)

Civil Action No. 03-2488 (RJL)

CASS BALLENGER,)
)
Defendant.)MEMORANDUM OPINION

(March 29, 2005) [#9]

Plaintiff, Council on American-Islamic Relations, Inc. ("CAIR"), filed the instant action against Defendant, former United States Congressman Cass Ballenger ("Congressman Ballenger"), alleging the common law tort claims of slander *per se*, slander, libel *per se*, and libel.¹ Presently before the Court is Defendant's Motion to Dismiss. Defendant contends that a statement attributed to him was made in the scope of his employment as a federal employee and, as a consequence, the Plaintiff's suit should be *converted* into an action against the United States, and the claims should be barred under the doctrine of sovereign immunity. After due consideration of the pleadings, the Court upholds the Government's certification that the Defendant's statement was made in the scope of his employment and GRANTS the Defendant's Motion to Dismiss.

¹ Mr. Ballenger was an elected member of Congress from North Carolina when this suit was filed in 2003. In 2004, he retired from Congress.

(u)

I. BACKGROUND

When a federal employee is sued for a wrongful or negligent act, the Westfall Act empowers the Attorney General, or his designee, to certify that the employee **was** acting at the **time** within the scope of his employment. *See* Federal Employees Liability Reform and Tort Compensation Act of 1988 (“Westfall Act”), 28 U.S.C. § 2679(d)(1). “Upon certification, the employee is dismissed from **the** action **and** the United States is substituted as Defendant.” *Schneider v. Kissinger*, 310 F. Supp. 2d 251, 264 (D.D.C. 2004). In **the** instant case, pursuant to 28 U.S.C. § 2679(d), the United States Attorneys Office for the District of Columbia certified that Congressman Ballenger was acting within the scope of his employment **as** a United States Congressman when, in response to a reporter’s inquiry about his recent divorce from his **wife** of fifty years, he attributed their separation, in part, to his wife’s discomfort with their neighbors, CAIR, who the Congressman then characterized as the “fund-raising **arm** for Hezbollah.” Affidavit of Cass Ballenger (“Ballenger Aff.”) ¶ 8; Compl. ¶ 6; Pl.’s Br. **Opp’n** FTCA Cert. at 5; Def.’s **Fed.** Tort Claims Act Scope Cert. (“Def.’s FTCA Cert.”) 7-8. In its memorandum in support of certification, the Government argued that the Congressman was acting “within the scope of his employment,” pursuant to the test set forth in the Restatement (Second) of Agency, because speaking to the press **is** conduct expected of a United States Congressman, and the statement was made from his congressional office during **regular** business hours. *See* Def.’s FTCA Cert. at 8-12.

Upon receiving the Government's certification, Defendant filed the instant motion arguing that the United States **was** now the proper Defendant, and Plaintiff's claims should be barred under the doctrine of sovereign immunity. Def.'s Mot. Dismiss at 5. In its opposition, Plaintiff contends that the Congressman's statement **was** outside the scope of his employment because statements concerning marital status do not concern conduct that he was employed to **perform**, and the statement **was** not made in furtherance of his legislative agenda. Pl.'s Br. Opp'n FTCA Cert. at 6-13. **For** the following reasons, the Court concludes that Congressman Ballenger was acting **within** the scope of his employment, **and** the United States is immune from suit under § 2680(h) of the Federal Tort Claims Act ("FTCA").

11. SCOPE OF EMPLOYMENT

Judicial review of the government's certification that an employee was acting within the scope of his employment is *de novo*. *Gutierrez de Martinez v. Lamagno*, 515 U.S. 417, 423-434 (1995). Although not conclusive, the certification must be treated by the Court as *prima facie* evidence. *Kimbrow v. Velten*, 30 F.3d 1501, 1509 (D.C.Cir. 1994). Accordingly, those challenging the certification bear the burden of rebutting the government's findings. *Stokes v. Cross*, 327 F.3d 1210, 1215 (D.C. Cir. 2003). The Plaintiff has failed to meet its burden.

Relying on precedent not binding on this Court, the Plaintiff argues, in essence, **that** Congressman Ballenger's comment about CAIR **was** not within the scope of his employment because the statement had no relationship to, or impact on, any of the Congressman's pending legislation. Pl.'s Br. Opp'n FTCA Cert. at 13-14. However,

Plaintiff's analysis of the "scope of employment" issue does not comport with the applicable District of Columbia law, which **by** well established practice is controlling on the issue of the scope of the Congressman's employment. *Huddon v. United States*, 68 F.3d 1420,1423-24 (D.C. Cir. 1995); *Schneider*, 310 F. Supp. 2d at 265.

Here, the allegedly defamatory statement ~~was~~ made by the Congressman from his office on Capitol Hill. Ballenger Aff. ¶ 8. The District of Columbia law **looks** to the Restatement (Second) of Agency (1958) to define the scope of **an** employee's conduct. *Stokes*, 327 F.3d at 1215 (citing *Huddon*, 68 F.3d at 1423-24). Under the Restatement,

[c]onduct of a servant is within the scope of employment if, but **only** if [a] it is of the kind he is employed to perform; [b] it occurs substantially within the authorized time and space **limits**; [c] it is actuated, at least in part, by a purpose to serve the master; and [d] if force is intentionally used by the servant against another, the use of force is not unexpected by the master.

RESTATEMENT (SECOND) OF AGENCY § 228(1). The District excludes all actions committed solely for servant's own purposes. *Stokes*, 327 F.3d at 1216. However, the District takes an expansive view of what conduct may be deemed within the scope of employment. *Weinberg v. Johnson*, 518 A.2d 985, 988-90 (D.C. 1986); *Lyon v. Carey*, 533 F.2d 649 (D.C. Cir. 1976); *see also Brown v. Argenbright Sec., Inc.*, 782 A.2d 752, 758 (D.C. 2001). Because the parties do not dispute that Congressman Ballenger made the allegedly defamatory comment to the reporter from his congressional office **during** the **workday**, and because no force was used, only the first and third criteria are at issue.

With respect to the first criterion, (i.e., whether the conduct ~~was~~ of the kind Congressman Ballenger was employed to perform), the Congressman's actions "must have either been 'of the same general nature as that authorized' or 'incidental to the

conduct authorized.” *Huddon*, 68 F.3d at 1424; RESTATEMENT (SECOND) OF AGENCY, § 228(1)(a). The District’s law liberally construes this first prong of the Restatement’s respondeat superior analysis, *Stokes*, 327 F.3d at 1216 (citing *Huddon*, 68 F.3d at 1425-26; *Weinberg*, 518 A.2d at 988-90). Moreover, the Supreme Court has noted that members of Congress engage in a “wide range of legitimate ‘errands’ performed for constituents” including “news releases” and “speeches delivered outside the Congress.” *United States v. Brewster*, 408 U.S. 501, 512 (1972). To say the least, speaking to the press is a critical part of the expected and authorized conduct of a United States Congressman. *See id.*; *Williams v. United States*, 71 F.3d 502, 504 (5th Cir. 1995). Accordingly, Congressman Ballenger’s proactive comments clarifying the reasons for his marital separation were not only authorized, but a necessary effort, in his judgment, to ensure his continued effectiveness as a legislator both at home and in the Congress. *Cf. Operation Rescue Nat’l v. United States*, 975 F. Supp. 92, 108 (D. Mass. 1997) (noting that Senator Kennedy’s remarks were not made gratuitously in a speech at a fundraising event, but rather “were made in response to questions posed by the media”).

Regarding the third criterion, the Court finds that Congressman Ballenger’s conduct was actuated, at least in part, by a purpose to serve the master. *See* RESTATEMENT (SECOND) OF AGENCY § 228(1)(c). The Plaintiff’s contention that a Congressman’s comments must be made in relation to pending legislation to be “within the scope” is overly restrictive, impractical, and based on case law that is not binding on this Court. Pl. Br. Opp’n FTCA Scope Cert. at 13, 14 (citing *Williams*, 71 F.3d 502; *Operation Rescue National v. United States*, 975 F. Supp. 2d 92 (D. Mass. 1997)).

Although the courts in *Williams* and *Operation Rescue National* arguably attached some significance **to** the discussion of pending legislation, the presence or absence of “pending legislation” is not dispositive here because the District considers the range of conduct deemed “actuated, at least in part, to serve the master” expansively. *Weinberg*, 518 A.2d at 992; *Lyon*, 533 F.2d at 652. **And** perhaps more importantly under District of Columbia law, the conduct need only be motivated *in part* by a purpose to serve the master. RESTATEMENT(SECOND)AGENCY § 228.

Here, Congressman Ballenger acknowledges that his comment was “motivated in significant part **by his** desire to preserve his ability to continue advancing his legislative agenda in Congress and thereby best serve the interests of his constituents.” Ballenger *Aff.* ¶ 7. He knew and acknowledged that reports of his marital status “would be of concern in [his] **socially** conservative **district**,” and that “a public scandal related to [his] marital status could undercut [his] ability to *carry out* these responsibilities, both in the near term **and** in the long term **if** it were to become **an** issue in a future *re-election* campaign.” *Id.* at 7. Because the Congressman was acting, at least in **part**, for the purpose of preserving his effectiveness, this Court finds he **was** thus acting within the scope of his employment at the time of the incident in question. Accordingly, it will uphold the Government’s certification, and issue an order dismissing Congressman Ballenger **and** substituting **the** United States as the **nomina** Defendant in this case. *Haddon*, 68 F.3d at 1423.

III. IMMUNITY UNDER THE FTCA

Having substituted the United States, the final question before the Court is whether the United States is **immune** from suit under the FTCA. The doctrine of sovereign immunity **bars** all suits against the United States except in the event of an explicit statutory waiver of such immunity. *Cox v. Secretary of Labor*, 739 F. Supp. 28, 29 (D.D.C. 1990). While the FTCA is one common source for a waiver of sovereign immunity, § 2680(h) of **the FTCA** specifically excludes “[a]ny claim arising out of assault, battery, false imprisonment, malicious prosecution, abuse of process, *libel*, *slander*, misrepresentation, deceit, or interference with contract rights” from that waiver. 28 U.S.C. § 2680(h) (emphasis added). Because the sole basis of plaintiff's suit is **defamation**, the Court concludes that the United States is **immune** from suit pursuant to § 2680(h). See 28 U.S.C. § 2680(h). Accordingly, since this **Court** lacks subject matter jurisdiction over this case, Defendant's motion to dismiss is **GRANTED** with prejudice.

IV. CONCLUSION

For the reasons described above, the Court **grants** Defendant's Motion to Dismiss **and** dismisses the case with prejudice. **An** appropriate order will issue contemporaneously herewith.



RICHARD L. LEON
United States District Judge

EXHIBIT 10

SANDLER, REIFF & YOUNG, P.C.

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August 1, 2007

Via Facsimile

Ron Robinson, President
Young America's Foundation
110 Elden Street
Herndon, VA 21070

Re: Young America's Foundation
29th National Conservative Student Conference

Dear Mr. Robinson:

We are writing on behalf of our client, Council on American-Islamic Relations Action Network, Inc. ("CAIR"), of Washington, D.C. It has come to CAIR's attention that YAF's National Conservative Student Conference has scheduled a session for Thursday, August 2, 2007, at 4:00 p.m. entitled, "The Truth about the Council on American-Islamic Relations," featuring Robert Spencer.

You should be aware that Mr. Spencer, a well-known purveyor of hatred and bigotry against Muslims, has a history of false and defamatory statements. Several of those statements have falsely accused CAIR of activity that would constitute a federal criminal offense.

CAIR is, in fact, America's largest Muslim civil liberties group. It has 32 offices and chapters nationwide and in Canada. Its mission is to enhance understanding of Islam, encourage dialogue, protect civil liberties, empower American Muslims and build coalitions that promote justice and mutual understanding.

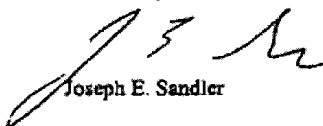
CAIR has consistently taken a principled position against terrorism and extremism. In 2005 alone, CAIR backed a fatwa against terrorism; its anti-terror online petition was signed by more than 690,000 individuals; and produced public service announcements repudiating extremist ideologies.

For these reasons, we demand that YAF cancel the subject session, or else take steps to ensure that false and defamatory statements are not disseminated at that session.

Our clients have instructed us to pursue every available and appropriate legal remedy to redress any false and defamatory statements that are made at the session.

Please let us know by the close of business today, Wednesday, August 1, 2007, whether you intend to comply with these requests.

Sincerely yours,



Joseph E. Sandler

EXHIBIT 11

☐ ISRAEL MFA

Search

MFA ☐ Terrorism ☐ Terror since 2000 ☐ V
☐ Go! Palestinian Terror since Sept 2000



MFA newsletter

Victims of Palestinian Violence and Terrorism since September 2000

**1,154 people have been killed by
Palestinian violence and
terrorism since September 2000.**



Between September 29, 2000 and May 1, 2006, Magen David Adom treated a total of 7,844 casualties as follows: 999 killed, 642 severely injured, 940 moderately, and 5,263 lightly injured, among them 11 MDA staff members. (IDF casualties treated by IDF medical personnel are not included in these figures.)

Note: This list also includes 18 Israelis killed abroad in terror attacks directed

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specifically against Israeli targets, and 3 American diplomatic personnel killed in Gaza.

Number of Israelis killed in terror attacks



Number of Israelis wounded in terror attacks



Number of suicide terror attacks



Number of Israelis killed in suicide attacks



Number of Kassam rockets fired at Israel





List of victims by date:

Sept 27, 2000 - Sgt. David Biri, 19, of Jerusalem, was fatally wounded in a bombing near Netzarim in the Gaza Strip.

Sept 29, 2000 - Border Police Supt. Yosef Tabeja, 27, of Ramle was shot to death by his Palestinian counterpart on a joint patrol near Kalkilya.

Oct 1, 2000 - Border Police Cpl.


 Main terror attacks against Israeli civilians
IDF soldier
Sept 2000
Spokesman


 In Memory of Victims of Terror in Israel (in Hebrew)

 ZAKA Rebuilding and Recovery

 One Family

 Terror Victims Association


 Chabad's 70th Anniversary Victims Project

 Natal - Israel Trauma Center for Victims of War

 NAVAH

 Kids for Kids

 Social Work Following Terror Attacks (Jerusalem Municipality)

 Casualties (JPost)

 CNN In-depth Victims of

Madhat Yusuf, 19, of Beit Jann, died of gunshot wounds sustained in a gun battle with Palestinians at Joseph's Tomb in Nablus.

Oct 2, 2000 - Wichlav Zalsevsky, 24, of Ashdod, was shot in the head in the village of Masha on the trans-Samaria highway.

Sgt. Max Hazan, 20, of Dimona, died of gunshot injuries sustained near Beit Sahur.

Oct 8, 2000 - The bullet-riddled body of Hillel Lieberman, 36, of Elon Moreh was found at the southern entrance to Nablus.

Oct 12, 2000 - First Cpl. Yosef Avrahami and First Sgt. Vadim Norzhich, 33, two reserve IDF soldiers, were lynched by a Palestinian mob at the police building in Ramallah.

Oct 19, 2000 - Rabbi Binyamin Herling, 64, of Kedumim, was killed when Fatah members and Palestinian security forces opened fire on a group of Israeli men, women, and children on a trip at Mount Ebal near Nablus.

Oct 28, 2000 - The body of Marik Gavrilov, 25, of Bnei Aysh was found inside his burned-out car, between the village of Bitunia and Ramallah.

Oct 30, 2000 - Eish-Kodesh Gilmor, 25, of Mevo Modi'in, was shot and killed while on duty as a security guard at the National Insurance Institute's East Jerusalem branch. Another guard was injured. Amos Machloulf, 30, of the Gilo neighborhood in Jerusalem, was found murdered in a ravine near Beit Jala.

Nov 1, 2000 - Lt. David-Hen Cohen, 21, of Karmiel and Sgt. Shlomo Adshina, 20, of Kibbutz Ze'elim were killed in a shooting incident in the Al-Hader area, near Bethlehem.

Nov 1, 2000 - Maj. (res.) Amir Zohar, 34, of Jerusalem was killed in the Nahal Elisha settlement in the Jordan Valley while on active reserve duty.

Nov 2, 2000 - Ayelet Shahar Levy, 28, and Hanan Levy, 33, were killed in a car bomb explosion near the Mahane Yehuda market in Jerusalem. 10 people were injured in the blast. The Islamic Jihad claimed responsibility for the attack.

Nov 8, 2000 - Noa Dahan, 25, of Moshav Mivtahim in the south, was shot to death while driving to her job at the Rafah border crossing in Gaza.

Nov 10, 2000 - Sgt. Shahar Vekret,

20, of Lod was fatally shot by a Palestinian sniper near Rachel's Tomb at the entrance to Bethlehem.

Nov 11, 2000 - Sgt. 1st Class Avner Shalom, 28, of Eilat, was killed in a shooting attack at the Gush Katif junction in the Gaza Strip.

Nov 13, 2000 - Sarah Leisha, 42, of Neveh Tzuf was killed by gunfire from a passing car while travelling near Ofra, north of Ramallah. Cpl. Elad Wallenstein, 18, of Ashkelon, and Cpl. Amit Zanna, 19, of Netanya were killed by gunfire from a car passing the military bus carrying them near Ofra.

Nov 13, 2000 - Gabi Zaghour, 36, of Netivot was killed by gunfire directed at the truck he was driving near the Kissufim junction in the southern part of the Gaza Strip.

Nov 18, 2000 - St.-Sgt. Baruch (Snir) Flum, 21, of Tel-Aviv was shot and killed by a senior Palestinian Preventive Security Service officer who infiltrated the Kfar Darom greenhouses in the Gaza Strip. St.-Sgt. Sharon Shitoubi, 21, of Ramle, wounded in the Palestinian shooting attack in Kfar Darom, died of his wounds on Nov 20.

Nov 20, 2000 - Miriam Amitai, 35, and Gavriel Biton, 34, both of Kfar

Darom, were killed when a roadside bomb exploded alongside a bus carrying children from Kfar Darom to school in Gush Katif. Nine others, including 5 children, were injured.

Nov 21, 2000 - Itamar Yefet, 18, of Netzer Hazani died from a gunshot wound to the head by Palestinian sniper fire at the Gush Katif junction.

Nov 22, 2000 - Shoshana Reis, 21, of Hadera, and Meir Bahrame, 35, of Givat Olga, were killed, and 60 wounded when a powerful car bomb was detonated alongside a passing bus on Hadera's main street, when the area was packed with shoppers and people driving home from work. 60 were wounded in the blast.

Nov 23, 2000 - Lt. Edward Matchnik, 21, of Beersheba, was killed in an explosion at the District Coordination Office near Gush Katif in the Gaza Strip. (The joint DCOs were established at the borders of Palestinian-ruled areas under the interim peace accords and were responsible for coordinating security and humanitarian cooperation.)

Nov 23, 2000 - Sgt. Samar Hussein, 19, of Hurfeish, was killed when Palestinian snipers opened fire at soldiers patrolling the border fence near the Erez crossing.

Nov 24, 2000 - Maj. Sharon Arameh, 25, of Ashkelon was killed by Palestinian sniper fire in fighting near Neve Dekalim in the Gaza Strip.

Nov 24, 2000 - Ariel Jeraffi, 40, of Petah Tikva, a civilian employed by the IDF, was killed by Palestinian fire as he travelled near Otzarin in the West Bank.

Dec 8, 2000 - Rina Didovsky, 39, a Beit Hagai school teacher on her way to work, and Eliyahu Ben-Ami, 41, of Otniel, the driver of the van, were killed when a car full of gunmen opened fire on the van near Kiryat Arba.

Dec 8, 2000 - Sgt. Tal Gordon, 19, was killed when gunmen in a passing car opened fire on an Egged bus traveling south from Tiberias to Jerusalem on the Jericho bypass road.

Dec 21, 2000 - Eliahu Cohen, 29, of Modi'in was shot and killed tonight by Palestinian terrorists waiting in ambush on the road between Givat Ze'ev and Beit Horon.

Dec 28, 2000 - Capt. Gad Marasha, 30, of Kiryat Arba and Border Police Sgt.-Maj. Yonatan Vermullen, 29, of Ben-Shemen, were killed when called to dismantle a road-side

bomb near the Sufa crossing in the Gaza Strip. The bomb was dismantled, but another bomb exploded, killing both and injuring two other soldiers. The Islamic Jihad claimed responsibility for the attack.

Dec 31,2000 - Binyamin Zeev Kahane, the son of the late right-wing leader Meir Kahane, and his wife, Talia, were killed when Palestinian snipers opened fire while they were driving on the Ramallah bypass road. Five of their children, aged two months to 10 years, were injured.

Jan 5,2001 - The body of Mordechai Cohen, 34, of Hadera was found in the Caesarea industrial area.

Jan 14, 2001 - The bullet-ridden body of Ron Tzalah, 32, of Kfar Yam in Gush Katif, apparently killed on Sunday night (Jan 14), was found the following morning near the Kfar Yam hothouses.

Jan 17,2001 - Ofir Rahum, 16, of Ashkelon, traveled to Jerusalem to meet a young woman with whom he had conducted a relationship over the Internet. She then drove him toward Ramallah. At a prearranged location, another vehicle drove up and three Palestinian gunmen

inside shot Rahum more than 15 times. One terrorist drove off with Rahum's body and dumped it, while the others fled in the second vehicle.

Jan 23,2001 - Motti Dayan, 27, and Etgar Zeituny, 34, cousins from Tel Aviv, were abducted from a restaurant in Tulkarem by masked Palestinian gunmen and executed.

Jan 25,2001 - Akiva Pashkos, **45**, of Jerusalem, was shot dead in a terror attack near the Atarot industrial zone north of Jerusalem.

Jan 29, 2001 - Arye Hershkowitz, 55, of Ofra, was killed by shots fired from a passing car near the Rama junction north of Jerusalem.

Feb 1, 2001 - Dr. Shmuel Gillis, 42, of Carmei Tzur, was killed by Palestinian gunmen who fired at his car near the Aroub refugee camp on the Jerusalem-Hebron highway.

Feb 1, 2001 - Lior Attiah, 23, of Afula was shot to death by terrorists while traveling near Jenin.

Feb 4,2001 - Ishmael Abadyev, 35, of Tirat Hacarmel, was stabbed to death by two terrorists from Jenin as he alighted from the bus on his way home from work.

Feb 5, 2001 - St.-Sgt. Rujayah

Salameh, 23, was killed by sniper fire near Rafah.

Feb 11, 2001 - Tzachi Sasson, 35, of Kibbutz Rosh Tzurim in Gush Etzion, was shot and killed by Palestinian gunmen as he drove home from Jerusalem.

Feb 14, 2001 - Simcha Shitrit, 30, of Rishon Lezion; Staff-Sgt. Ofir Magidish, 20, of Kiryat Malachi; Sgt. David Iluz, 21, of Kiryat Malachi; Sgt. Julie Weiner, 21, of Jerusalem; Sgt. Rachel Levi, 19, of Ashkelon; Sgt. Kochava Polanski, 19, of Ashkelon; Cpl. Alexander Manevich, 18, of Ashkelon; and Cpl. Yasmin Karisi, 18, of Ashkelon were killed when a bus driven by a Palestinian terrorist plowed into a group of soldiers and civilians waiting at a bus stop near Holon, south of Tel-Aviv. In addition, 25 people were injured in the attack.

Feb 26, 2001 - The body of Mordechai Shefer, 55, of Kfar Sava, was found in an olive grove near Moshav Hagor. An autopsy revealed that he was murdered. Investigators suspect terrorist motives.

Mar 1, 2001 - Claude Knap, 29, of Tiberias was killed and 9 people injured when a terrorist detonated a bomb in a Tel Aviv to Tiberias

service taxi at the Mei Ami junction in Wadi Ara.

Mar 4, 2001 - Naftali Dean, 85, of Tel Mond; his niece, Shlomit Ziv, 58, of Netanya; and Yevgenya Malchin, 70, of Netanya were killed in a suicide bombing in downtown Netanya; 60 people were injured. The Hamas claimed responsibility for the attack.

Mar 19, 2001 - Baruch Cohen, 59, of Efrat, was killed by shots fired at his car while driving to work in Jerusalem from his home in the Gush Etzion area. After being hit by bullets, he lost control of the car and collided with an oncoming truck.

Mar 26, 2001 - Shalhevet Pass, age 10 months, was killed by sniper fire at the entrance to the Avraham Avinu neighborhood in Hebron.

Mar 28, 2001 - Eliran Rosenberg-Zayat, 15, of Givat Shmuel and Naftali Lanzkorn, 13, of Petah Tikva were killed in a suicide bombing at the Mifgash Hashalom ("peace stop") gas station several hundred meters from an IDF roadblock near the entrance to Kalkilya, east of Kfar Saba. Four people were injured. Hamas claimed responsibility for the attack.

Apr 1, 2001 - Staff Sgt. Ya'akov

Krenschel, 23, of Nahariya, an IDF reserve soldier, was killed in a firefight between army and Palestinian forces southeast of Nablus.

Apr 1, 2001 - Dina Guetta, 42, of Haifa, was stabbed to death on Ha'atzmaut Street. Her murder was the initiation rite into a terrorist cell apprehended in July.

Apr 2, 2001 - Sgt. Danny Darai, 20, of Arad, was killed by a Palestinian sniper after completing guard duty at Rachel's Tomb at the entrance to Bethlehem.

Apr 21, 2001 - The mutilated body of Stanislav Sandomirsky, 38, of Beit Shemesh, was found in the trunk of his car near a village north of Ramallah late last night. Terrorist motives are suspected.

Apr 22, 2001 - Dr. Mario Goldin, 53, of Kfar Sava, was killed when a terrorist detonated a powerful bomb he was carrying near a group of people waiting at a bus stop on the corner of Weizman and Tchernichovsky streets. About 60 people were injured in the blast. Hamas claimed responsibility.

Apr 28, 2001 - Sgt. Shlomo Elmakias, 20, of Netanya, was killed and four women passengers

wounded in a drive-by terrorist shooting attack on the Wadi Ara highway in the Galilee.

Apr 28, 2001 - Simcha Ron, 60, of Nahariya, was found stabbed to death in Kfar Ba'aneh, near Carmiel in the Galilee. The terrorists responsible for the attack were apprehended in July.

May 1, 2001 - Assaf Hershkowitz, 30, of Ofra, was killed when his vehicle was fired upon and overturned at a junction between Ofra and Beit El.

May 8, 2001 - Arnaldo Agranionic, 48, was murdered by terrorists as he guarded the Binyamin Farm, a lonely outpost where he lived, on an isolated hilltop east of Itamar in Samaria.

May 9, 2001 - Yossi Ish-Ran, 14, and Kobi Mandell, 14, both of Tekoa, were found stoned to death in a cave about 200 meters from the small community south of Jerusalem where they lived.

May 10, 2001 - Constantin Straturula, 52, and Virgil Martinesc, 29, two Romanian citizens employed by an Israeli contractor, were killed in a bomb attack while repairing a vandalized fence at the Kissufim Crossing into the Gaza

District.

May 15, 2001 - Idit Mizrahi, 20, of Rimonim, was fatally shot in a terrorist ambush as she drove with her father and brother on the Alon Highway to attend a family wedding. Terrorists fired 30 bullets, 19 of which hit the family's car.

May 18, 2001 - Tirza Polonsky, 66, of Moshav Kfar Haim; Miriam Waxman, 51, of Hadera; David Yarkoni, 53, of Netanya; Yulia Tratiakova, 21, of Netanya; and Vladislav Sorokin, 34, of Netanya were killed in a suicide bombing at Hasharon Mall in the seaside city of Netanya, in which over 100 were wounded. Hamas claimed responsibility for the attack.

May 18, 2001 - Lt. Yair Nebenzahl, 22, of Neve Tzuf (Halamish), was killed and his mother seriously wounded, in a Palestinian roadside ambush north of Jerusalem.

May 23, 2001 - Asher Iluz, 33, of Modi'in was killed outside Ariel en route to supervise a road paving in the area, when Palestinian gunmen opened fire in an ambush.

May 25, 2001 - The burnt body of Yosef Alfasi, 50, of Rishon Letzion, was discovered near the West Bank city of Tulkarem.

May 29, 2001 - Gilad Zar, 41, of Itamar, was shot dead in a terrorist ambush while driving in the West Bank between Kedumim and Yizhar. The Fatah Tanzim claimed responsibility for the attack.

May 29, 2001 - Sara Blaustein, 53, and Esther Alvan, 20, of Efrat, were killed in a drive-by shooting near Neve Daniel in the Gush Etzion bloc south of Jerusalem. The Fatah Tanzim claimed responsibility for the attack.

May 31, 2001 - Zvi Shelef, 63, of Mevo Dotan, was killed in a drive-by shooting attack in northern Samaria north of Tulkarem. He was shot in the head and died en route to hospital.

June 1, 2001 - Marina Berkovizki, 17, of Tel Aviv; Roman Dezanshvili, 21, of Bat Yam; Ilya Gutman, 19, of Bat Yam; Anya Kazachkov, 16, of Holon; Katherine Kastaniyada-Talkir, 15, of Ramat Gan; Aleksei Lupalu, 16, of the Ukraine; Mariana Medvedenko, 16, of Tel Aviv; Irina Nepomneschi, 16, of Bat Yam; Yelena Nelimov, 18, of Tel Aviv; Yulia Nelimov, 16, of Tel Aviv; Raisa Nimrovsky, 15, of Netanya; Pvt. Diez (Dani) Normanov, 21, of Tel Aviv; Simona Rodin, 18, of Holon; Ori Shahr, 32, of Ramat Gan; Liana Sakiyan, 16, of Tel Aviv;

Maria Tagilchev, 14, of Netanya; and Irena Usdachi, 18, of Holon were killed when a suicide bomber blew himself outside a disco near Tel Aviv's Dolphinarium along the seafront promenade just before midnight on Friday. Sergei Panchenko, 20, of the Ukraine; Yael-Yulia Sklianik, 15, of Holon; Jan Bloom, 25, of Ramat Gan; and Yevgenia Dorfman, 15, of Bat Yam died subsequently from their injuries. 120 people were wounded in the bombing.

June 11, 2001 - Yehuda Shoham, aged 5 months, of Shilo, died of injuries incurred in a fatal stoning on June 5. He was critically injured by a rock thrown at the family's car near Shilo in Samaria.

June 11, 2001 - Boris Korover, 59, of Homesh was killed near his home in an apparent car accident later defined as a terror attack.

June 12, 2001 - Father Georgios Tsibouktzakis, 34, a Greek Orthodox monk from the St. George Monastery in Wadi Kelt in the Judean desert, was shot and killed while driving on the Jerusalem-Ma'ale Adumim road.

June 14, 2001 - Lt.Col. Yehuda Edri, 45, of Ma'ale Adumim was killed by a Palestinian informant for

Israeli intelligence in a shooting attack on the Bethlehem bypass tunnel road connecting the Gush Etzion bloc with Jerusalem. One of his security guards was seriously injured,

June 18, 2001 - Dan Yehuda, 35, of Homesh was killed in a drive-by shooting attack between Homesh and Shavei Shomron, near Nablus. Alex Briskin, 17, was moderately injured.

June 18, 2001 - Doron Zisserman, 38, of Einav, was shot and killed in his car by sniper fire near the entrance to Einav, east of Tulkarem. Fatah claimed responsibility for the attack.

June 20, 2001 - Ilya Krivitz, 62, of Homesh in Samaria was shot and killed at close range in an ambush late Wednesday afternoon in the nearby Palestinian town of Silat a-Dahar.

June 22, 2001 - Sgt. Aviv Iszak, 19, of Kfar Saba, and Sgt. Ofir Kit, 19, of Jerusalem, were killed in a suicide bombing near Dugit in the Gaza Strip as a jeep with yellow Israeli license plates, supposedly stuck in the sand, blew up as they approached.

June 28, 2001 - Ekaterina (Katya)

Weintraub, 27, of Ganim in northern Samaria was killed and another woman injured late Thursday afternoon by shots fired at the two-car convoy on the Jenin bypass road.

July 2, 2001 - Aharon Obadyan, 41, of Zichron Ya'akov was shot and killed near Baka a-Sharkia, north of the West Bank city of Tulkarem and close to the 1967 Green Line border, after shopping at the local market.

July 2, 2001 - The body of Yair Har Sinai, 51, of Susiya in the Hebron hills, missing since Monday (July 2) was found early Tuesday morning shot in the head and chest.

July 4, 2001 - Eliahu Na'aman, 32, of Petah Tikva, was shot at point-blank range just inside the Green Line at Sueika, near Tulkarem.

July 9, 2001 - Capt. Shai Shalom Cohen, 22, of Pardes Hanna, was killed and another soldier was wounded when an explosive charge detonated beneath their jeep after leaving the Adoraim IDF base south of Hebron.

July 13, 2001 - Yehezkel (Hezi) Mualem, 49, father of four from Kiryat Arba, was shot and killed between Kiryat Arba and Hebron

while protesting a shooting attack in the area the previous day.

July 14, 2001 - David Cohen, 28, of Betar Illit, died of injuries sustained in a drive-by shooting in Kiryat Arba on July 12.

July 16, 2001 - Cpl. Hanit Arami, 19, and St. Sgt. Avi Ben Harush, 20, both of Zichron Yaakov, were killed and 11 wounded - 3 seriously - when a bomb exploded in a suicide terrorist attack at a bus stop near the train station in Binyamina, halfway between Netanya and Haifa, at about 19:30 Monday evening. The Islamic Jihad claimed responsibility for the attack.

July 24, 2001 - The body of Yuri Gushchin, 18, of Jerusalem, brutally murdered, bearing stab and gunfire wounds, was found in Ramallah.

July 26, 2001 - Ronen Landau, 17, of Givat Ze'ev, was shot and killed by Palestinian terrorists while returning home from Jerusalem with his father.

Aug 5, 2001 - Tehiya Bloomberg, 40, of Karnei Shomron, mother of five and 5 months pregnant, was killed when Palestinian gunmen opened fire on the family vehicle between Alfei Menashe and Karnei Shomron. Three people were